Privacy Impact Assessment
Veterinary Services
NCAH NITC Platform (N2P)

Policy, E-Government and Fair Information Practices

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Privacy Impact Assessment for the NCAH NITC Platform (N2P)

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Document Revision and History

Revision	Date	Author, Title & Office	Comments
1.2018	2 Feb 2018	Jon Hasse, ISSO, APHIS/VS	
2.2018	29 Mar 2018	Jon Hasse	CVB edits from Bonnie
3.2018	29 Aug 2018	Jon Hasse	Applied USDA Privacy checklist

Abstract

This Privacy Impact Assessment (PIA) is for the USDA, Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), National Centers for Animal Health (NCAH) National Information Technology Center (NITC) Platform (N2P). N2P allows USDA to deliver and manage general capabilities to support day-to-day internal business operations for VS and ARS National Animal Disease Center (NADC). All capabilities are managed from Ames, IA. This PIA is being completed following the Privacy Threshold Analysis (PTA) conclusion requiring a PIA for N2P.

NCAH Portal is the only service in N2P that collects Personally Identifiable Information (PII). This assessment addresses NCAH Portal when the assessment question addresses collection of PII. The information collected or stored in the other N2P services is either not PII or will not be retrieved from the files by using the name or personal identifier of the individuals and is, therefore, in the opinion of the Department, not subject to provisions of the Privacy Act of 1974.

Overview

The purpose of the N2P information system is to use NITC to deliver and manage general capabilities to support day-to-day internal business operations for VS and ARS NADC. N2P capabilities are mainly used at NCAH in Ames, IA. NITC allows VS and NADC to perform these primarily administrative tasks in an enterprise environment that is reliable and cost effective. VS has procured and configures an application server and database service offered by NITC to deliver the following capabilities to VS and NADC:

Internal Capabilities
NCAH BioSafety Application (BIOSAFETY): BIOSAFETY improves the NCAH ability to meet federal, USDA, and external reporting requirements on biologically contaminated equipment management, biosafety management, select agent certifications and biosafety training.
Field Activity Report (FAR): FAR supports monitoring and reporting of field work efforts in support of key VS program and mission areas.
Glassware Repository and Media Service (GRAMS): GRAMS records the formulations, ordering, production, delivery and inventory of glassware and media supplies needed to support NCAH testing and research laboratories.
Information Technology (IT) Governance Application (ITGOV): ITGOV allows portfolio and project management personnel to predict, request, execute, and report expense related information concerning governed IT investments. ITGOV supports the APHIS and USDA governance requirements.

User Management Service (UMS): UMS automates application user access authorization and user recertification. Employee supervisors can request and certify the need for application access. Application owners can authorize, validate, and manage recertification for access to integrated systems.
Licensing, Serial Release, & Testing Information Service (LSRTIS): LSRTIS manages regulatory program information associated with the Virus, Serum, and Toxin Act required for CVB to make decisions about the safety and efficacy of veterinary biologics products produced and distributed in the United States and exported throughout the world.
External Capabilities
NCAH Portal (Portal): Portal provides a secure gateway for external customers allowing digital communication with the NCAH programs. Submissions are validated and directly entered into VS internal information systems. Customers can get near real-time status updates on their diagnostic, biologic, and licensing submissions as well as historical search capabilities.

The information in the system is either non-PII (e.g. training titles, chemical names, equipment names, document names, and animal information), USDA employee information (e.g. name, phone, and email), animal/specimen information (e.g. weight, slaughter date, flock size), liaison information (e.g. business contact), or animal owner/sample submitter PII that is limited to name and contact information.

Typical transactions are either completely internal to the USDA, or include internet facing data submissions. Internal transactions include tracking equipment, reporting work tasks, ordering glassware, authorizing employee roles, and notifying USDA employees by email.

Center for Veterinary Biologics

The first type of transaction originating over the internet support submitting information to USDA and receiving results, all electronically. Biologic firms can submit digital forms and respond to USDA processing to support the USDA regulation of biologic firms. USDA Center for Veterinary Biologics (CVB) maintains this transaction, dataflow, and information entirely inside N2P.

National Veterinary Services Laboratories

In the second transaction over the internet, animal owners or sample submitters can submit request forms for laboratory tests from National Veterinary Services Laboratories (NVSL). Test results can be returned to submitter or owners through N2P. All internet facing transactions are protected by USDA e-Authentication. E-Authentication uniquely identifies each user of N2P. Submitters can only access the submissions and their test results. Given the complexity of the laboratory testing, laboratory testing in managed in a different system,

VS Laboratory Information System (VS LIMS) (CSAM #1226). Test results are moved from VS LIMS to N2P in order to return results to the animal owner or submitter.

Authorities

CVB has a specific legal authority supporting the use of N2P Under the 1913 Virus–Serum–Toxin Act where USDA APHIS is responsible for ensuring that all veterinary biologics produced in or imported into the United States are pure, safe, potent, and effective. This regulatory activity is accomplished by Title 9, Code of Federal Regulations, Parts 101 to 123 by the CVB in Ames, IA.

The NVSL safeguards 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.

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

The following information is collected with N2P:

Customer:

- Veterinary Biologics Firm Name
  - Subsidiary/Division Names
  - Firm Address (Multiple Administrative & Production Sites)
  - Firm Contact Name
  - Firm Contact Phone No.
  - Firm Contact e-mail
  - Firm Contact Educational Credentials
  - Firm Contact Position at Firm and no. of years at Firm
- Submitters of Diagnostic samples (Customers)
  - Shipping Address o Invoice Address o Contact Name
  - Contact Phone Number
  - Contact e-mail
  - NVSL Submitter ID

US Government Employee:

- Employee Information
  - Employee Name
  - Employee Job Title
  - Employee Business Phone no.

- Employee E-mail
- Employee Supervisor
- Employee Organizational Group within NADC, NVSL and CVB

Diagnostic sample information:

- Wildlife/ Zoo/ owner
- If owner then:
  - Owner Name
  - Owner City
  - Owner State
  - Owner Zip
  - Owner Country
- Location of Animal
- Total Numbers of Animals
- Herd or Flock size
- Herd or Flock affected
- Herd or Flock Dead
- Date collected
- Collected by Authorized by Preservation
- Purpose
- Country origin
- Country destination
- FAD Number
- Referral Number
- Total Number of Specimens
- Total Number of Animals
- Testing information
- Sample information
- Comments

Slaughtering Establishment Information:

- Establishment ID
- Establishment Name
- Establishment Address
- Establishment City
- Establishment State
- Establishment Zip
- Establishment Country
- Establishment email
- Establishment Fax
- Establishment Phone

Tuberculosis Sample Information:

- Food Inspector Name
- Veterinarian Name
- Market Buyer Name
- Market Buyer Address
- Market Buyer City
- Market Buyer State
- Market Buyer Zip
- Market Buyer Country
- Lot number
- Number in Lot
- Number with Lesions
- Slaughter Date
- Species Type
- Age Number, Unit, and Class
- Sex
- Carcass Number and Tag Number
- Dressed Weight
- Live Weight
- Specimen Type
- Preservation Type
- Animal ID and Type
- Post Mortem Report – Tissue and Condition
- Comments

Salmonella Sample Information:

- Owner/Location Information including name, address, premises ID, and Accession/Referral Number
- Type of Exam Requested
- Sample Information – Specimen Cultured, Species, Clinical Role, Culture Number, O Group, and Serotype
- National Poultry Improvement Plan (Y/N)
- Comments

Diagnostic testing information:

- Tests requested
- Disease
- Concentration
- Sex
- Sample ID
- Animal ID
- Age
- Age Unit

- Age Classification

1.2 What are the sources of the information in the system?

The sources of the information are USDA employees, biologic firm employees, State animal health partners, and roles listed above (e.g. food inspector).

1.3 Why is the information being collected, used, disseminated, or maintained?

The information is being collected so that USDA:

- Can complete its mission of regulation veterinary biologics and ensure pure, safe, potent, and effective biologics.
- Process samples in the laboratory and return results to customer
- Track routine tasks and equipment for USDA employees

1.4 How is the information collected?

The information is collected directly from the USDA employee, firm employee, animal health partner, or other contact person (e.g. food inspector). It is collected as digital input at a web-based user interface with keyboard.

1.5 How will the information be checked for accuracy?

All data entered is validated by APHIS Veterinary Services. VS employees review and validate the information before the information is used in the CVB LSRTIS or VS LIMS. USDA employees ensure data is free of typographical errors (e.g. place names and biomedical terms), formatting errors (e.g. email, zip, and phone number formats), and logical errors (e.g. animal counts are in integers). VS employees will not make any changes to the data entered. If there are any issues with the accuracy of the data, the submitted request is returned to the submitter unprocessed. VS will ask for it to be reviewed and resubmitted. The webpage also validates inputted information while the user is entering the information (e.g. only certain types of characters can be entered into specific fields, security control SI-10, etc.).

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

For CVB, the 1913 Virus–Serum–Toxin Act. Specific regulations are located in Title 9, Code of Federal Regulations, Parts 101 to 123. For 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.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Unauthorized access to this data is the privacy risk. This is mitigated by using capabilities common to USDA and the commercial products used. This includes:

- System access control by USDA E-Authentication
- User based role access
- Separation of duties
- Limiting web access
- Audit logging

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

Internal Capabilities
NCAH BioSafety Application (BIOSAFETY): BIOSAFETY improves the NCAH ability to meet federal, USDA, and external reporting requirements on biologically contaminated equipment management, biosafety management, select agent certifications and biosafety training.
Field Activity Report (FAR): FAR supports monitoring and reporting of field work efforts in support of key VS program and mission areas.
Glassware Repository and Media Service (GRAMS): GRAMS records the formulations, ordering, production, delivery and inventory of glassware and media supplies needed to support NCAH testing and research laboratories.
Information Technology (IT) Governance Application (ITGOV): ITGOV allows portfolio and project management personnel to predict, request, execute, and report expense related information concerning governed IT investments. ITGOV supports the APHIS and USDA governance requirements.
User Management Service (UMS): UMS automates application user access authorization and user recertification. Employee supervisors can request and certify the need for application access. Application owners can authorize, validate, and manage recertification for access to integrated systems.

Licensing, Serial Release, & Testing Information Service (LSRTIS): LSRTIS manages regulatory program information associated with the Virus, Serum, and Toxin Act required for CVB to make decisions about the safety and efficacy of veterinary biologics products produced and distributed in the United States and exported throughout the world.
External Capabilities
NCAH Portal (Portal): Portal provides a secure gateway for external customers allowing digital communication with the NCAH programs. Submissions are validated and directly entered into VS internal information systems. Customers can get near real-time status updates on their diagnostic, biologic, and licensing submissions as well as historical search capabilities.

2.2 What types of tools are used to analyze data and what type of data may be produced?

None.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

The system does not use commercially or publically available data.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

The following controls are in place to ensure information is handled in accordance with the described uses:

- System access control by USDA E-Authentication
- User based role access
- Separation of duties
- Limiting web access
- Encryption
- Audit logging

Section 3.0 Retention

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

3.1 How long is information retained?

Internal Capabilities
NCAH BioSafety Application (BIOSAFETY): BIOSAFETY does not have an approved NARA schedule. Alternatively, it can be retained under direction of the USDA Office of General Counsel for any suspension of disposal.
Field Activity Report (FAR): FAR does not have an approved NARA schedule. Alternatively, it can be retained under direction of the USDA Office of General Counsel for any suspension of disposal.
Glassware Repository and Media Service (GRAMS): GRAMS does not have an approved NARA schedule. Alternatively, it can be retained under direction of the USDA Office of General Counsel for any suspension of disposal.
Information Technology (IT) Governance Application (ITGOV): ITGOV does not have an approved NARA schedule. Alternatively, it can be retained under direction of the USDA Office of General Counsel for any suspension of disposal.
User Management Service (UMS): does not have an approved NARA schedule. Alternatively, it can be retained under direction of the USDA Office of General Counsel for any suspension of disposal.
Licensing, Serial Release, & Testing Information Service (LSRTIS): LSRTIS information is retained as directed by the NARA approved scheduled. Alternatively, it can be retained under direction of the USDA Office of General Counsel for any suspension of disposal.
External Capabilities
NCAH Portal (Portal): Portal does not have an approved NARA schedule. Alternatively, it can be retained under direction of the USDA Office of General Counsel for any suspension of disposal.

3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

The records retention approval is pending further work with the APHIS Records Officer.

3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

An excessive length of time for retaining data increases the risk of unauthorized access. This is mitigated by using capabilities common to USDA and the commercial products used. This includes:

- System access control by USDA E-Authentication
- User based role access
- Separation of duties
- Limiting web access
- Audit logging

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

None. Information is kept internal to the VS organization.

4.2 How is the information transmitted or disclosed?

Information is not transmitted or disclosed within USDA.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Information is not transmitted or disclosed within USDA.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

Information is not transmitted or disclosed to organizations external to the USDA.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the

program or system is allowed to share the personally identifiable information outside of USDA.

Not applicable.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

Not applicable.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Not applicable.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Does this system require a SORN and if so, please provide SORN name and URL.

No.

6.2 Was notice provided to the individual prior to collection of information?

Not applicable.

6.3 Do individuals have the opportunity and/or right to decline to provide information?

Not applicable.

6.4 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

Not applicable.

6.5 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

Not applicable.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

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

A person may submit a Freedom of Information Act request. All inquiries should be addressed in one of the following manners:

VIA MAIL: Animal and Plant Health Inspection Service Director, Freedom of Information and Privacy Act Staff 4700 River Road, Unit 50 Riverdale, MD 20737

VIA FACSIMILE: 301-734-5941

VIA E-MAIL: foia.officer@aphis.usda.gov (NOTE: While e-mail attachments are often an important and legitimate means of conducting business, they also have the potential to cause great harm to our e-mail infrastructure, as well as to individual workstations. Please place the text of your FOIA request into the 'body' of the email message.)

VIA Web Request Form: Located at the following link: https://efoia-pal.usda.gov/palMain.aspx.

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 them by submitting a written request to the system manager at the address above. Include the reason for contesting the record and the proposed amendment to the information with supporting documentation to show how the record is inaccurate.

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

All public or regulated entities that enter information into NCAH Portal are not notified of the procedures to correct that information. However, the Contact Us link is available on most Portal webpages. The Contact Us page includes address, email, and phone number information to allow for a quick response from APHIS. This Contact Us webpage serves as a broad collection point for all concerns and questions, including corrections needed by the entities that use Portal.

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

Not applicable.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

APHIS has a formal redress procedure in place and there is minimum risk.

Section 8.0 Technical Access and Security

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

8.1 What procedures are in place to determine which users may access the system and are they documented?

Any public and regulated entity that wishes to conduct business with the NCAH (CVB or NVSL) can gain access to the application. All users must have an E-Authentication account in order to gain access to the application. All CVB submitters must then complete and submit APHIS Form 2007 (OMB 0579-0013) Contact and Qualifications of Veterinary Biologics Personnel. Once access is authorized, N2P users are provide the least amount of privilege (roles) to access their data.

8.2 Will Department contractors have access to the system?

No.

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

All users are required to complete Information Technology (IT) Security Awareness Training. USDA employees must additionally sign APHIS Rules of Behavior form prior to receiving access to the information system. Additionally, those employees with functions that play a key security role in the IT system must complete annual specialized role-based training and a Privileged Rules of Behavior. All users must then complete annual Security Awareness Training.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

Yes. The capabilities described in Section 2.1 of this PTA where authorized with these information systems in CSAM:

Information System	ATO expiration date	USDA PII Status?
LSRTIS *(UMS)*	22 August 2020	No
FOSS *(BIOSAFTEY, FAR, GRAMS, ITGOV)*	2 January 2021	No

NCAH Portal	18 September 2018	Yes

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

Formal auditing measures for N2P will include independent security assessments performed annually in support of A&A efforts. The independent assessments will be performed per the timeframe of the N2P continued authorization.

As to technical safeguards:

- N2P is continuously monitored in several different ways. NITC performs scans to identify possible threats and provides results to the VS CIO Technology staff. The vulnerabilities identified are required to be remediated by the responsible parties.
- Security related incidents are reported to the ISSM and requires an investigation. APHIS Cyber Incident Response Team and USDA Agriculture Security Operations Center work together to respond and handle all incidents.
- Operational technical safeguards to prevent data misuse begin with access control. Access to N2P is protected by role-based access which is managed by the network firewall, E-Authentication, and the backend systems that are queried. Users must have a Level 1 or Level 2 E-Authentication account. Users are only able to view information on previous submissions that they submitted (i.e. linked to their username).
- Auditing logs are enabled at both the application and database levels.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Unauthorized disclosure of personal information, as identified in Section 1.1 above, is the primary privacy risk to information shared. This risk is mitigated through technical and procedural information security controls levied on internal holders. N2P and NITC GSS technical security controls are delineated in the current N2P System Security Plan.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies used by the system, including system hardware and other technology.

9.1 What type of project is the program or system?

This information system uses commercially available programing languages, and software. The operating system platform, hardware, and infrastructure are all provided by the USDA government cloud, NITC, in Kansas City..

9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

No.

Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 "Guidance for Online Use of Web Measurement and Customization Technology" and M-10-23 "Guidance for Agency Use of Third-Party Websites and Applications"?

Yes.

10.2 What is the specific purpose of the agency's use of 3rd party websites and/or applications?

Google reCAPTURE service is used on the publically accessible portion of the website. It is located on the *Contact Us* webpage. reCAPTURE is used to protect the Contact Us from spam and other abuse.

10.3 What personally identifiable information (PII) will become available through the agency's use of 3rd party websites and/or applications.

None.

10.4 How will the PII that becomes available through the agency's use of 3rd party websites and/or applications be used?

Not applicable.

10.5 How will the PII that becomes available through the agency's use of 3rd party websites and/or applications be maintained and secured?

Not applicable.

10.6 Is the PII that becomes available through the agency's use of 3rd party websites and/or applications purged periodically?

Not applicable.

If so, is it done automatically?

Not applicable.

If so, is it done on a recurring basis?

Not applicable.

10.7 Who will have access to PII that becomes available through the agency's use of 3rd party websites and/or applications?

Not applicable.

10.8 With whom will the PII that becomes available through the agency's use of 3rd party websites and/or applications be shared - either internally or externally?

Not applicable.

10.9 Will the activities involving the PII that becomes available through the agency's use of 3rd party websites and/or applications require either the creation or modification of a system of records notice (SORN)?

Not applicable.

10.10 Does the system use web measurement and customization technology?

Not applicable.

If so, is the system and procedures reviewed annually to demonstrate compliance to OMB M-10-23?

Not applicable

10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?

Not applicable.

If so, does the agency provide the public with alternatives for acquiring comparable information and services?

Not applicable.

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.

Not applicable.

Approval Signatures

BYRON RIPPKE

Digitally signed by BYRON RIPPKE
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United States Department of Agriculture

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APHIS Privacy Act Officer

Legislative and Public Affairs

United States Department of Agriculture