Privacy Impact Assessment

Veterinary Services Laboratory Information Management System

Policy, E-Government and Fair Information Practices

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United States Department of Agriculture

Privacy Impact Assessment for the

VS Laboratory Information Management System (VS LIMS)

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Abstract

- This Privacy Impact Assessment (PIA) is for the USDA/APHIS/Veterinary Services (VS)/National Veterinary Services Laboratories (NVSL)/Laboratory Information Management System (LIMS).
- The VS LIMS is used to manage diagnostic testing, reagent and agent inventory efforts at USDA/APHIS/VS/D&B/NVSL. It holds information related to the submitters, animal owners, received test samples, testing data, usage history, and inventories of agents and reagents.
- This PIA was conducted because the system collects personally identifiable information from *customers*, *submitters and animal owners.*

Overview

- The VS LIMS (also referred to as LIMS) is owned by NVSL.
- The VS LIMS is a laboratory information system that tracks and saves test results on diagnostic samples received at the NVSL. The information collected includes test results, submitter, animal owner, agent and reagent inventory samples, and sample information.
- The VS LIMS contains personal information from customers submitting diagnostic samples, and USDA employee names with job-related information.
- USDA employees enter data from laboratory records or paperwork provided by sample submitter into a form in the VS LIMS application, which the application stores in the database server. Requests for information are made in a similar manner. The request is compiled on the application server and transmitted to the database. The database renders the information back to the application which then displays the information to the authorized user. Automated reports are delivered via email or fax when authorized for release. Access to the VS LIMS is internal to USDA APHIS staff.
- Searchable Test Result Application for NVSL Diagnostics (STRAND) is owned by NVSL.
- STRAND is an Oracle Application Express (APEX) based application that allows customers and submitters to view test results, reports, and submission forms which have been released by the NVSL from LIMS. Customers can only output associated and linked to their submission.
- STRAND contains all information released on reports from the NVSL including submitter, owner, animal, and test result information.
- NVSL is using Pacific Biosciences for whole genome sequences to characterize and maintain reference strains diseases of national importance to animal agriculture and public health as described in the VS LIMS PTA. Currently PacBio is not FedRAMP certified although their services are in the FedRAMP-accredited Amazon Web

Services (AWS) Government Community Cloud (AWS GovCloud) which is accredited at the moderate level. Therefore, at the request of the USDA OCIO Compliance, Audit, Policy and Enforcement (CAPE) representatives, APHIS has conducted a risk based decision (RBD) for the use of the PacBio services. The USDA approved RBD can be located in CSAM.

- VS LIMS has an Authorization Date of 10 May 2017 and is categorized as a "Moderate" 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?

Customer:

- Submitters of Diagnostic Samples
  - Shipping Address
  - Invoice Address
  - Contact Name
  - Contact Phone Number
  - Contact e-mail

US Government Employee:

- Employee Information
  - Employee Name
  - Employee Job Title
  - Employee Business Phone no.
  - Employee E-mail
  - Employee Supervisor
  - Employee Organizational Group within NVSL and Center for Veterinary Biologics (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
- National Poultry Improvement plan (Y/N)
- Specimen
- Species
- O-Group
- Serotype
- Culture Number
- Clinical Role
- Contract number
- 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

- Dressed Weight
- Live Weight
- Post Mortem Report
- Tissue
- Condition

Diagnostic testing information

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

Other

- Tracking information on biological agents and toxins
- Tracking information on reagents.

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

The sources of information in the system are from submission forms that accompany laboratory specimens sent into the laboratory for diagnostic testing. The NVSL receives approximately 50,000 submissions annually. Samples are received from State and private veterinary diagnostic laboratories, private veterinary practitioners, Federal meat inspectors, Federal field veterinarians, and others. In addition, the NVSL receives laboratory samples from other countries for import cases and for cases where diagnostic assistance is requested.

The system also contains an inventory of biological reference and reagent material developed at the NVSL. The biological reference material from the Amazon GovCloud AMI is not stored in LIMS.

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

The information is required in order to process samples through the testing and reporting workflow in the laboratories. The system also maintains test records as required by APHIS policy.

1.4 How is the information collected?

The information is collected using the OMB-approved NVSL submission form that best fits the type of sample being submitted. An official NVSL submission form is used for every sample submitted:

VS 10-4 – General Specimen Submission
VS 10-3 – Request for Salmonella Serotyping
VS 5-38 – Parasite Submission Form
VS 6-35 – Report of Thoracic Granulomas in Regular Kill Animals
VS 4-54 – Brucellosis Test Record Market Cattle Testing Program
VS 5-14 – Dip Sample Data
VS 17-31 – Dourine and Glanders Import Test Report

In addition, an inventory of biological reference and reagent material is maintained by authorized NVSL employees.

1.5 How will the information be checked for accuracy?

The following steps are taken for data verification:

1. Submission form received at USDA and data entered by receiving technician.
2. Sample testing is performed and documented by lab technician.
3. Test results are entered into the system by a data entry clerk or lab technician.
4. Lab Manager checks for accuracy by reviewing submission documents and test result's document that were entered into the system by a clerk or technician.
5. Case Coordinator verifies completeness of data by reviewing documents.

Data are randomly audited by internal quality assurance personnel. Data are occasionally audited by external auditors conducting peer reviews or accreditation audits to ensure the NVSL is adhering to strict ISO accreditation standards.

A group of SQL statements run weekly to look for data integrity issues. These SQL statements currently checks for errors in a variety of areas (including but not limited to):

- Closed accessions where all appropriate accession level data appropriately shows the accession as closed.
- Closed accessions with parent samples that have not either been authorized or cancelled.
- Accessions flagged as part of an outbreak but the outbreak name is null.
- Billable accessions where there are errors in billing data.

Whenever a developer notices a new problem with data, they are asked to develop a SQL statement that can be used to detect if that data problem comes up again in the future.

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

The collection of information in the VS LIMS system is thru OMB-approved forms 10-4, 10-3, 5-38, 6-35 and 5-14. Additional information on these forms can be found at: http://www.aphis.usda.gov/animal_health/lab_info_services/forms_publications.shtml. Validity of these forms invokes OMB's approval number:

U.S Legal Code: Title 7, Chapter 9, #8308 is invoked to validate the collection of information.

U.S Legal Code: Title 7, Chapter 9 #8308: Detection, control and eradication of diseases and pests:

(A) In general
The Secretary may carry out operations and measures to detect, control or eradicate any pest or disease of livestock (including the drawing of blood and diagnostic testing of all animals), including animals at a slaughterhouse, stockyard or other point of concentration.

(B) Compensation

(1) In general
The Secretary may pay a claim arising out of the destruction of any animal, article, or means of conveyance consistent with the purposes of this chapter.

(2) Specific Cooperative programs
The Secretary shall compensate industry participants and state agencies that cooperate with the Secretary in carrying out operations and measure under subsection (A) for 100 percent of eligible costs relating to cooperative programs involving Federal, State and industry participants to control diseases of low pathogenicity in accordance with regulations issued by the secretary.

(3) Reviewability
The action of the Secretary in carrying out paragraph (1) shall not be subject to review by any officer or employee of the Federal government other than the secretary or the designee of the secretary.

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

All access to LIMS is internal to NVSL staff. Submitting veterinarians, Area Veterinarian in Charge, and State veterinarians can only read test reports through STRAND, which is fed by LIMS. This group does not have direct access to LIMS.

User accounts control the permissions in the LIMS. The LIMS functions are assigned to roles. A user account is granted one or more roles. At login, the user must select a role

they have been granted which enables the associated functions. Users only see roles they have been granted. Row level access to information is enforced by the application. There are approximately 200 users to the system. The users are APHIS employees that are located at the USDA offices in Ames, Iowa, or Plum Island, New York.

Submitting veterinarians, Area Veterinarian in Charge, and State veterinarians must authenticate to STRAND via an eAuthentication Level 2 account (authorization without PIV) and are granted read-only permissions to view the results for tests which they have submitted.

There are no connections between LIMS and a PacBio SMRT AMI. No privacy risks have been identified between these two items. AMI has no connection to LIMS data. AMI output is not stored in LIMS.

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.

Records in the system document the submission forms and the intake of laboratory specimens sent to NVLS for diagnostic testing. Records are used to store information from veterinary diagnostic laboratories, private veterinary practitioners, Federal meat inspectors, Federal field veterinarians, and others for the purpose of returning their test results to them. Each submission is attributed a unique, miscellaneous accession number. For the small number of cases sent to PacBio, the accession number is used to identify only the sample. The accession number does not contain PII and NVSL can use the accession number to link the PacBio results to the original submitter.

Records in the system document the results of individual animal disease testing performed by or under the auspices of the NVSL. Records include official test reports for animal import, export, movement, and program disease status certifications. Also included are official test results for suspected foreign animal disease investigations and for animal diseases targeted by the USDA for control or eradication.

Records in the system provide current and historical data used for detecting animal diseases, conducting emergency responses, conducting and evaluating animal disease control measures, performing epidemiological investigations, and forecasting possible animal disease occurrences and outbreaks.

Animal disease that require more in depth testing is sent to a Pacific Biosciences (PacBio) Single Molecule, Real-Time (SMRT) sequencing platform which is provided by Amazon GovCloud and is used by BNVSL. PacBio is used to meet NVSL' responsibility to characterize and maintain reference strains of diseases of national importance to animal agriculture and public health. Every sample of the 200,000 received annually by NVSL is assigned an accession number that is stored in LIMS. This accession number is included with the shipment and is the only LIMS data associated with PacBio.

The results from PacBio are reviewed, annotated and made publically available at the National Center for Biotechnology Information (NCBI). The whole genome is then immediately available for any nation managing a disease or outbreak by USDA. The digital output from the PacBio is not stored in LIMS.

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

LIMS uses Crystal Reports and a PDF toolkit, which are integrated with the LabWare Commercial-Off-The Shelf (COTS) software. LIMS does not use open source software. The analysis of data by the system is limited formatting functionality offered by Crystal Reports and the PDF file format.

The system can produce reports based on specific fields which are then manually analyzed by APHIS VS STAS NVSL staff.

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

The system does not use commercial or publicly available data. Access to PacBio SMRT software on the AMI is a commercial source of data that is not loaded, stored, or used in LIMS.

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.

Privacy rights of the customer and employees will be protected by USDA and NVSL management. Target systems also have security controls to address access to and security of information.

- 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. Once the roles have been identified, the individual must pass a proficiency test approved by the Quality Assurance staff and perform tasks associated with that role. Once the completed forms for both have been received verifying both areas, the individual is given access to the production instance of LIMS.
- All access to the system is limited by username and password.
- All access to the network is limited by PIV and pin 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.

- Users are trained and are required to formally confirm that they understand value and sensitivity of data in the system.
- All users receive formal system training and are required to pass a proficiency test before being given access to the system.
- Warning banner must be acknowledged before logging in.

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?

A select number of records are maintained "indefinitely" aka "permanent value" by NARA.: http://www.archives.gov/records-mgmt/publications/disposition-of-federal-records/chapter-4.html.

Paper records are retained for a minimum of 3 years. Data is maintained in the system for 25 years. The data is archived at 5 years intervals.

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

No. POA&M ID 30015 was established to track the Records Scheduling request to NARA.

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

Risks associated with data retention are minimal and include the possibility of the data being accessed by unauthorized personnel. However, test reports and submission forms contain data of limited use. Personally Identifiable Information (PII) would be limited to names, addresses, and phone numbers of submitters; data that are usually easily accessible by other means.

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?

For customers who pay via National Finance Center (NFC), LIMS billing data for diagnostic testing and reagents will be transferred to the NFC via the APHIS/VS User Fees System (UFS).

Information is also shared within USDA that includes report data released by the NVSL to the APHIS VS Surveillance, Preparedness, & Response Services (SPRS) District Directors. Information is also shared with VS staff for administration, oversight, and decision-making about animal disease program activities, and USDA officials for investigating possible violations of USDA regulations and Federal laws. This sharing of information is compatible with the purpose of diagnosing animal diseases and supporting VS disease control and eradication programs.

4.2 How is the information transmitted or disclosed?

Information is disclosed within the USDA using automated reports that are delivered via email, fax, or digital file when authorized for release.

All access to LIMS is internal to USDA APHIS staff. Submitting veterinarians, Area Veterinarian in Charge, and State veterinarians receive test reports through STRAND. The STRAND application is fed by LIMS, but they have no direct access to LIMS.

Data is retrieved by either an accession number, which is a system generated ID, or a sample number which was assigned by the submitter. Searches may also be performed using personally identifiable information such as submitter first name, last name, or company name in order to determine accession numbers associated with their submitter number.

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.

- All access to the data in the system is controlled by formal authorization.
- All access to the system is limited by username and password or eAuthentication.
- The application limits access to relevant information and prevents access to unauthorized information.
- Users are trained and required to formally confirm that they understand value and sensitivity of data in the system.
- All users receive formal system training and are required to pass a proficiency test before being given access to the system.
- Warning banner must be acknowledged before logging in.
- Shared information is restricted to what pre-defined views and procedures allow.
- All information sharing with internal systems is done over the internal APHIS network.

- Encryption of information in transit between systems is defined by the host systems (USDA, APHIS, VS, UFS and National Animal Health Laboratory Network Information System), not LIMS. LIMS will comply with mandated encryption settings when communicating with said systems.

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?

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, records maintained in the system may be disclosed outside USDA as follows:

(1) To the State animal health official in each State, State veterinary examining or licensing boards, and the American Association of Veterinary State Boards to certify accreditation or license status or exchange information regarding disciplinary action(s);

(2) To the public for the purpose of locating and contacting an accredited veterinarian who has granted APHIS permission to provide business contact information;

(3) To the appropriate agency, whether Federal, State, local, or foreign, charged with responsibility of investigating or prosecuting a violation of law or of enforcing, implementing, or complying with a statute, rule, regulation, or order issued pursuant thereto, of any record within this system when information available indicates a violation or potential violation of law, whether civil, criminal, or regulatory in nature, and either arising by general statute or particular program statute, or by rule, regulation, or court order issued pursuant thereto;

(4) To the Department of Justice when: (a) The agency, or any component thereof; or (b) any employee of the agency in his or her official capacity; or (c) any employee of the agency in his or her individual capacity where the Department of Justice has agreed to represent the employee; or (d) the United States is a party to litigation or has an interest in such litigation, and the use of such records by the Department of Justice is deemed by the agency to be relevant and necessary to the litigation; provided, however, that in each case, the agency determines that disclosure of the records to the Department of Justice is a use of the information contained in the records that is compatible with the purpose for which the records were collected;

(5) For use in a proceeding before a court or adjudicative body before which the agency is authorized to appear when: (a) The agency, or any component thereof; or (b) any employee of the agency in his or her official capacity; or (c) any employee of the agency in his or her individual capacity where the agency has agreed to represent the employee; or (d) the United States is a party to litigation or has an interest in such litigation, and the agency determines that use of such records is relevant and necessary to the litigation; provided, however, that in each case, the agency determines that disclosure of the records to the court is

a use of the information contained in the records that is compatible with the purpose for which the records were collected;

(6) To appropriate agencies, entities, and persons when: (a) The agency suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised; (b) the agency has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, a risk of identity theft or fraud, or a risk of harm to the security or integrity of this system or other systems or programs (whether maintained by the agency or another agency or entity) that rely upon the compromised information; and (c) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm;

(7) To contractors and other parties engaged to assist in administering the program. Such contractors and other parties will be bound by the nondisclosure provisions of the Privacy Act;

(8) To USDA contractors, partner agency employees or contractors, or private industry employed to identify patterns, trends, or anomalies indicative of fraud, waste, or abuse. Such contractors and other parties will be bound by the nondisclosure provisions of the Privacy Act;

(9) To a congressional office from the record of an individual in response to an inquiry from the congressional office made at the written request of that individual; and

(10) To the National Archives and Records Administration or to the General Services Administration for records management inspections conducted under 44 U.S.C. 2904 and 2906.

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.

NVSL plans to share data collected in the LIMS database with the following:

- Submitting veterinarian and State veterinarians of the submitter state, animal owner state, and animal location state
- Federal officials to manage animal disease events

A SORN has been published and is named APHIS-19 Laboratory Information Management System. Information shared with the submitting veterinarian and State veterinarian will be identified as a "routine use" in the SORN.

The animal health protection act: Title 7, CFR Chapter 109 specifically parts 8301, 8308, and 8310

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

Submitting veterinarians and State veterinarians receive test reports by email and/or through STRAND, but they have no direct access to LIMS.

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

The risks identified are minimal as they will only include sharing names and addresses of animal owners that are likely to be easily available to the State Veterinarians through other avenues such as plat maps or property tax records. The risks are mitigated through only sharing the data with the submitting veterinarian and State veterinarians of the submitter state, animal owner state, and animal location state that need to be aware of diseases and tests results in their state.

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.

Yes, APHIS-19 Laboratory Information Management System, *https://www.federalregister.gov/articles/2013/10/01/2013-23868/privacy-act-systems-of-records-labware-laboratory-information-management-system*

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

Yes. The SORN has been published.

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

No, individuals that submit samples to be tested at the laboratory must submit all data required to assign appropriate test and report results. Individuals are not compelled to submit samples to the laboratory, however if an individual does choose to submit samples, required information to include personal information must be included to provide information and services to the customer.

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

No, the submitters' data are treated uniformly.

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.

Notice is provided to customers through APHIS SORN 19. Data are collected with the individual's knowledge, and data are voluntarily submitted to the laboratory along with test samples.

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?

Any individual may obtain information from a record in the system that pertains to him or her. 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://www.aphis.usda.gov/aphis/resources/foia/ct_how_to_submit_a_foia_request

7.2 What are the procedures for correcting inaccurate or erroneous information?

Inaccurate data are corrected by submitting requests to the Information Management group at the laboratory, and laboratory manager approval is required in order 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.

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

NVSL user documents contain the NVSL contact phone number, and the APHIS procedures can be found online.

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

A formal process is available.

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?

Criteria, procedures, and controls are documented in the internal standard operating procedure IMSOP300.03 (System Access to the National Veterinary Services Laboratories' Laboratory Information Management System – LabWare). Access to LIMS is based on the need to do business and determined by USDA APHIS VS NVSL management.

8.2 Will Department contractors have access to the system?

No. Access is based on need and is limited to USDA APHIS VS STAS NVSL employees.

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

Currently, all individuals provided access to the LIMS system are required to complete annual Information Technology (IT) Security Awareness Training and must sign APHIS Rules of Behavior form prior to receiving access to the information system.

Users are trained and are required to formally confirm that they understand the value and sensitivity of data in the system. All users receive formal system training and are required to pass a proficiency test before being given access to the system.

An information security warning banner must also be acknowledged and accepted before logging in to the system.

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

This application has an Authority to Operate (ATO) letter dated May 10, 2017.

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

Auditing is enabled both at the application and database level. Application-level auditing is defined by the vendor and enabled in the LIMS implementation. Database-level auditing is implemented and monitored according to internal SOP.

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 is identified as a security risk to the information collected. LIMS owner and support staff implement the agency recommended Management, Operation, and Technical controls necessary to mitigate this risk. The application of these controls is maintained annually and independently tested on an annual basis.

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?

The LIMS is a laboratory information system that tracks and saves test results on diagnostic samples received at the USDA APHIS VS STAS NVSL.

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

This application does not employ technology which may raise privacy concerns.

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"?

The ISSPM and System Owner have reviewed the memorandums.

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

There is no specific purpose of the agency's use of 3rd party websites or applications. LIMS does not connect to, and makes no use of 3rd party websites or applications. NVSL, the business unit that owns LIMS, does make use of the 3rd party PacBio SMRT sequencing platform provided by Amazon GovCloud. There are no interconnections between LIMS and PacBIO. No PII is shared with and received from PacBio.

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

None. LIMS does not connect to, and makes no use of 3rd party websites or applications.

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

It will not be used. LIMS does not connect to, and makes no use of 3rd party websites or applications.

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?

It will not be maintained or secured. LIMS does not connect to, and makes no use of 3rd party websites or applications.

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

No. LIMS does not connect to, and makes no use of 3rd party websites or applications.

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

No one. LIMS does not connect to, and makes no use of 3rd party websites or applications.

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?

No one. LIMS does not connect to, and makes no use of 3rd party websites or applications.

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)?

No. LIMS does not connect to, and makes no use of 3rd party websites or applications.

10.10 Does the system use web measurement and customization technology?

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.

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.

None are identified or mitigated. LIMS does not connect to, and makes no use of 3rd party websites or applications.

Responsible Officials

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