

Privacy Impact Assessment

Technology, Planning, Architecture, & E-Government

- Version: 1.2
- Date: January 2021
- Prepared by: USDA APHIS VS
Veterinary Services Integrated
Surveillance Modules (VSISM)





Privacy Impact Assessment for the Veterinary Services Integrated Surveillance Modules (VSISM)

January 2021

Contact Point

Orlando Baca

USDA APHIS Veterinary Services

Reviewing Official

Tonya Woods

Director, Freedom of Information and Privacy Act Staff

United States Department of Agriculture

(301) 851-4076

Abstract

- This Privacy Impact Assessment (PIA) is for the USDA, Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), Veterinary Services Integrated Surveillance Modules (VSISM).
- USDA APHIS 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 USDA 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 part of annual assessment documents update.

Overview

The USDA APHIS 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 USDA APHIS VSISM maintains the following data on collection site, animal, and specimen information, as well as conditions to test for on the specimens, depending on the stream and condition of interest.

Syndromic Observations

These are qualitative observations about a given animal grouped by important clinical subdivisions of the animal such as the nervous system, cardiovascular or musculoskeletal. This data is not characteristic of a disease, but of an animal. It can be used to assess the probability of a given disease and thus inform testing requests and epidemiological surveys. Currently some submissions capture clinical signs, but it is in reference to a specific disease, and there is no cross program standard.

Lab Submission Test Orders and Results

These include the recording of laboratory test results and interpretations for specimens submitted to a diagnostic lab. These results and interpretations are specific to a condition, unlike the recording of syndromic observations which may be related to more than one condition. Test results represent a quantitative determination of a given disease incidence in an animal determined through testing of specimens taken from the animal. The results are used to support specimen or animal level interpretations which have direct surveillance consequences.

Compliance Observations

This category is comprised of observations of the operating parameters of a facility engaged in specific production practices characterized by discrete quantitative or semi-quantitative parameters. For example, a waste feeder facility may require the temperature of the cooker to

be within a certain range, or a herd or flock certification¹ program may have requirements in place regarding fencing, allowed feed, etc. In general this data will be characteristic of either the premises or the animal group as a whole, not of individual animals.

The USDA APHIS 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.

USDA APHIS VSISM also maintains name, address, and phone information 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.

The USDA APHIS VSISM is funded by Congress through appropriated funds for the Animal Health Technical Services budget line item. The system received a renewal of its Authority to Operate (ATO) in May 2021. VSISM has a security categorization of “Moderate”.

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?

Information/Record Type	Component Data (Examples)
Premises	Physical location of a business or animal herd/flock
Observations	Attributes of the location, subjects, and samples collected
Test Orders and Results	Test submission information and test results for diseases such as Classical Swine Fever, Swine Brucellosis, Pseudorabies, or Foot and Mouth Disease,
Subject	Species, breed, sex, age, classification, and any associated individual animal or animal group identifiers.
Other	Specific ad-hoc data, miscellaneous identification numbers such as the regulatory

	official ID, animal observations at the collection site, compliance observations, and licensing information for persons and locations.
Lab	Testing laboratory
Data Collection Stream	Method or means by which the data is being collected, such as On-Farm, Slaughter, Slaughter Market, or Diagnostic Lab
Commodity Group	Overall surveillance program such as Swine Health
Person Information	Name, contact information for collector, submitter, owner, designated epidemiologist

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

The source of information for USDA APHIS VSISM is:

- information collected from visits to production facilities, slaughter plants, or other locations

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

The purpose of the USDA APHIS VSISM system is to allow animal health officials to effectively manage animal disease, pest and surveillance programs by providing:

- a) rapid detection and effective response to animal disease and animal pest events in the United States thereby reducing the spread of infections to new flocks/herds;
- b) epidemiological analysis, including diagnostic testing, surveillance activities, and other factors of epidemiologic importance for evaluating disease risk;

Summarized animal disease information is reported to the (OIE) Office International des Epizooties (World Organization for Animal Health). Some animal disease information is shared with world trading partners provided for risk analysis to demonstrate that US agricultural animal products are safe for export to other countries. Most risk analysis information is aggregated information and does not describe detailed record information.

Some animal disease information is shared with state and federal wildlife agencies, as animal disease frequently crosses over between domesticated animals and wildlife.

Some animal disease information is shared with state and federal public health agencies, as animal disease can cross over between domesticated animals and humans.

All information for a State, by definition, is shared with state animal health officials and state animal health databases for that State. State employees who are authenticated users have access to all the data collected about animals in their state. Federal users have access

to data to meet the mission of Veterinary Services. State partners use the information to manage animal diseases in their state.

1.4 How is the information collected?

The information collected from states, users, individuals and/or businesses in the general public is collected on OMB approved form VS 10-4, 6-35, 10-12 and 5-38 at a minimum, as well as approved non-forms. The information is entered directly into the USDA APHIS VSISM application by a state or federal employee entering information provided in person, over the phone, in an email, or letter by a producer. Members of the public do not access system to enter data themselves. Data is input by authenticated state and federal employees.

1.5 How will the information be checked for accuracy?

Data collected from customers, USDA sources and non-USDA sources are 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. Verification of data records occurs on an as-needed basis. Person address information only provides value during the lifecycle of the laboratory testing process and is not validated beyond the time of collection. Also, there are limited systematic data entry constraints to ensure entry completeness and acceptable values.

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

- 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
- 7 USC Sec. 7629
- 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.
- Farm Bills - an omnibus, multiyear law that governs an array of agricultural and food programs

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

Unauthorized disclosure of employee and other personal data, as identified in Section 1.1 above, was the primary privacy risk identified in the PTA. USDA APHIS, including the

VS Executive Team, District and Commodity Directors, Assistant District Directors, Centers for Epidemiology and Animal Health (CEAH), and State Veterinarians are all responsible for protecting the privacy rights of the employees and other persons identified in the VSISM as required by applicable State and Federal laws. Specific mitigation activities are:

- 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 USDA APHIS VSISM system.
- Access to USDA APHIS VSISM is controlled by the USDA eAuthentication system and/or APHIS VPN.
- The application limits access to relevant information and prevents access to unauthorized information.
- All users receive formal system training and are required to sign Rules of Behavior on an annual basis as part of the USDA mandatory information system security awareness training.
- At the login screen of the application the warning banner must be acknowledged before users are allowed access.

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.

The data 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.

State Veterinarians and State Animal Health officials, as co-owners of the data, have the discretion to share information stored in the USDA APHIS VSISM relevant to premises or persons within their state in accordance with state laws and regulations via public web sites and/or may store such information in animal health and surveillance management databases developed by State IT developers, contractors or other third party software vendors in a manner that provides secure data access.

Certain disease information reported by State and/or Federal employees is recorded in USDA APHIS VSISM. These reports are then summarized by APHIS in reports to the (OIE) Office International des Epizooties (World Organization for Animal Health). No 'customer', 'employee' or 'other' private information is published or distributed to OIE.

The Center for Epidemiology for Animal Health (CEAH) and the Commodity Health Centers have agency responsibility for reporting surveillance and program management

activities on a nationwide basis. The CEAH and the Commodity Health Centers have direct access to the USDA APHIS VSISM data and provide and publish summaries to the public and our trading partners.

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

USDA APHIS VSISM data is aggregated into a Data Analytics Warehouse where it is processed and visualized using business analysis tools such as Alteryx and Tableau. Data is also analyzed in Excel spreadsheets and by using SAS[®] (a statistical application). VSISM also uses VS Data Integration Services (a component of the APHIS Marketing Regulatory Services Amazon Web Service General Support System (MRP AWS GSS)) to integrate data with other VS data sources for performing mission critical analysis of surveillance data. Aggregated data is used to produce summary reports for stakeholders.

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

USDA APHIS VSISM does not use commercial or publicly 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.

- Privacy rights of the employees and other persons will be protected by USDA APHIS VS management within the limits of the Privacy Act of 1974. USDA APHIS VSISM has security controls to address access/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 USDA APHIS VSISM application.
- All requests for access to the system are verified by user identification and authentication. Users must have a government issued login and password that is controlled and managed either at the Veterinary Services, National, District or local offices or in the case of local State databases the State Veterinarian's office.
- The USDA APHIS VSISM application limits access to relevant information and prevents access to unauthorized information through role-based access.
- All users receive security basics training and are required to sign rules of behavior before being given access to the system. Additionally, all users receive security basics refresher training and sign rules of behavior on an annual basis.
- At the application login screen the warning banner must be acknowledged before users are allowed to log into the application.

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?

The records within the USDA APHIS VSISM application are considered permanent until the actual records retention scheduled is approved by NARA.

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

APHIS is currently developing a records schedule to cover these records.

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

Unauthorized disclosure of contact information, as identified in Section 1.1 above, is the primary privacy risk, as identified by the PTA. Personally Identifiable Information (PII) is limited to names, addresses, email and phone numbers of submitters/collectors and premises/animal owners, and premises identification numbers. The benefit of having that data available for premises backtracking and other trending information during an emergency overrides any risk of unauthorized disclosure. All records will be retained while VS awaits NARA disposition and retention scheduling. USDA APHIS VSISM maintains information in a secure manner and will dispose of information per APHIS Directive 3440.2 and approval NARA disposition authority.

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?

All data is available (for the areas/states for which they have responsibility) to USDA APHIS, including District and Commodity Directors, Assistant District Directors, district and national staff, Centers for Epidemiology and Animal Health (CEAH), for program implementation, oversight, and reporting. Data is also shared with the USDA Office of the Chief Information Officer's Data Lake environment for Tableau visualization.

4.2 How is the information transmitted or disclosed?

The APHIS and state users have access to the USDA APHIS VSISM through the APHIS Enterprise Infrastructure (AEI). For reporting, user roles and row-level permissions provide controlled access via Tableau tools and VS Data Integration Services (a

component of the APHIS Marketing Regulatory Services Amazon Web Service General Support System (MRP AWS GSS)). Data is transmitted to the OCIO Enterprise Tableau securely over the network.

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.

Unauthorized disclosure of contact information, as identified in Section 1.1 above, is the primary privacy risk to information shared internally to APHIS. These risks are mitigated through USDA APHIS VSISM and MRP Azure Cloud GSS security controls as delineated in the current USDA APHIS VSISM System Security Plan. Further, the animal health professionals who have access to the data are trained in the proper use and dissemination of this data. All access must be approved before it is granted. VS, where feasible and within the technical limitations, ensures activities within the VSISM are audited, PII is used only for authorized purposes and in a manner that is compatible with Privacy Act, and PII use is minimized to the extent necessary to meet the mission needs of the VS surveillance program.

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?

- To State/Tribal animal health officials and their contractors and other cooperators authorized access by State/Tribal animal health officials, data from their State/Tribe as co-owners of the data to: (a) Collaborate with USDA in conducting, managing, and evaluating animal health, disease, or pest surveillance or control programs, and monitoring for animal health, diseases or pests; (b) aid in containing and responding to a foreign or domestic animal disease or pest outbreak, bioterrorism, or other animal health emergency; (c) disseminate information and solicit feedback on emergency preparedness and response guidelines and the system itself for the purpose of educating and involving these officials in program development, program requirements, and standards of conduct; and (d) States/Tribes may share information on premises, persons, or animals within their State or Tribe in accordance with State or Tribal laws and regulations via public websites or other means;
- To Federal, State/Tribal, or local government agencies involved with public health such as the Departments of Health and Human Services and Homeland Security (DHS) for the purposes of collaborating with USDA to conduct, manage, or evaluate zoonotic disease or pest awareness, surveillance, response or reporting activities, or to respond to emergencies impacting humans and domestic animals;
- When a record on its face, or in conjunction with other records, indicates a violation or potential violation of law, whether civil, criminal, or regulatory in

nature, and whether arising by general statute or particular program, statute, or by regulation, rule, or order issued pursuant thereto, disclosure may be made to the appropriate agency, whether Federal, foreign, State, Tribal, local, or other public authority responsible for enforcing, investigating, or prosecuting such violation or charged with enforcing or implementing the statute, rule, regulation, or order issued pursuant thereto, if the information disclosed is relevant to any enforcement, regulatory, investigative, or prosecutive responsibility of the receiving entity;

- (4) To the Department of Justice when: (a) USDA or any component thereof; or (b) any employee of USDA in his or her official capacity, where the Department of Justice has agreed to represent the employee; or (c) the United States Government, is a party to litigation or has an interest in such litigation, and USDA determines that the records are relevant and necessary to the litigation and the use of such records by the Department of Justice is therefore deemed by USDA to be for a purpose that is compatible with the purpose for which USDA collected the records;
- (5) To a court or adjudicative body in a proceeding when: (a) USDA or any component thereof; or (b) any employee of USDA in his or her official capacity; or (c) any employee of USDA in his or her individual capacity where USDA has agreed to represent the employee; or (d) the United States Government is a party to litigation or has an interest in such litigation, and USDA determines that the records are both relevant and necessary to the litigation and the use of such records is therefore deemed by USDA to be for a purpose that is compatible with the purpose for which USDA collected the records;
- (6) To appropriate agencies, entities, and persons when: (a) USDA suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised; (b) USDA has determined that as a result of the suspected or confirmed breach there is a risk of harm to individuals, USDA (including its information systems, programs, and operations), the Federal Government, or national security; and (c) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with USDA's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm;
- (7) To another Federal agency or Federal entity, when information from this system of records is reasonably necessary to assist the recipient agency or entity in (a) responding to a suspected or confirmed breach or (b) preventing, minimizing, or remedying the risk of harm to individuals, the agency (including its information systems, programs, and operations), the Federal Government, or national security;
- (8) To contractors their agents, grantees, experts, consultants, and other performing or working on a contract, service, grant, cooperative agreement, or other assignment for the USDA, when necessary to accomplish an agency function related to this system of records. Individuals providing information under this routine use are subject to the same Privacy Act requirements and limitation on disclosure as are applicable to USDA officers and employees;

- (9) To a Congressional office in response to an inquiry from that Congressional Office made at the written request of the individual about whom the record pertains; and
- (10) To the National Archives and Records Administration or other Federal Government agencies pursuant to records management inspections being 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.

Yes. Where the USDA controls the personally identifiable information in the VSISM; use of that information will be governed by an appropriate routine use in Animal Health, Disease, and Pest Surveillance and Management System, USDA/APHIS-15. APHIS VS works with State authorities on data protection through the use of Non-Disclosure Agreements (NDAs), Interconnection Security Agreements (ISAs), Memorandum of Understandings (MOUs) and other agreements.

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

When the functionality is implemented to share information it will be shared on a case-by-case basis and there will be situations when it will be shared in bulk using the approved reporting and analysis tools. The information will be transmitted electronically in report format. If system owner approves system to system external interconnection, this connection will be made in a secure manner, conducted per routine uses outlined in the related System of Record Notice (SORN), and documented with an Interconnection Security Agreement (ISA) with the external sharing partner.

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

When, the functionality is implemented to share information it will be in accord with the stated purpose and use of the collection. Safeguards, such as, security and privacy training for organizational personnel will be required. Governance and technical procedures will restrict data access to only those allowed by the user. Finally, all requests for the sharing of PII must be reviewed/approved by the VS Executive Leadership, the System Owner, the VS Authorizing Officer and the APHIS Information Security Branch.

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

Yes. The APHIS 15 SORN is the official notice.

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

Yes. In order to participate in the program individuals must provide information. When choosing to participate, individuals must provide certain information in order to receive animal health services from APHIS.

Also, individuals involved in animal disease investigations are required to provide information as governed by specific animal health laws and regulations of the state in which they reside.

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

No. The use of the information will be noted in the routine uses of the SORN.

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

The System of Record Notice is the official notice. No information is collected without an individual's awareness. At the time of data collection, a form is being completed or the individual is speaking with a Federal or State employee. Information pertains to health status and location of an individual's animals.

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. Request 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, APHIS, 4700 River Road Unit 50, Riverdale, MD 20737-1232.

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 him/her 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?

Individuals are notified of procedures by the animal health officials at the point of data collection.

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

Any individual may contest information contained within a record in the system that pertains to him/her by submitting a written request to the system manager to the APHIS Privacy Act Officer, Legislative and Public Affairs, APHIS, 4700 River Road Unit 50, Riverdale, MD 20737-1232. Include the reason for contesting the record and the proposed amendment to the information with supporting documentation to show how the record is inaccurate.

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

The primary risk associated with the redress process is latency in making the correction. This risk is mitigated by empowering surveillance business representatives to address the update without IT intervention.

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?

Access to the USDA APHIS 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 must be requested in writing and approved by the supervisor or APHIS authorizing official.

Once access is authorized, users of USDA APHIS VSISM information are further controlled through electronic role-based access. 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.

8.2 Will Department contractors have access to the system?

Currently there are no VS IT contractors accessing this system.

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

All APHIS employees provided access to the USDA APHIS VSISM application 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. VS system owners and technical staff are required to complete Protecting PII training each year.

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

Yes. Authority to Operate expires 5/22/2021.

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

In accordance with FIP 199/200 Moderate Baseline Security Controls. Some of the technical safeguards for VSISM using Dynamics CRM is a security model that includes auditing, role-based views, field-level security, and division of security. This means any events, such as create, modify, soft delete, as well as users, and old and new values are audited at the field level. Even the audit history on individual record and/or audit history summary is also 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 they do not have access to. Finally, access control is a combination of eAuthentication (user credential and authentication) and authorization (VSISM roles).

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 employee and other personnel information, as identified in Section 1.1 above, is the primary privacy risk to information shared both internally and externally to the USDA. This risk is mitigated through technical and procedural information security controls levied on internal and external holders of USDA APHIS VSISM data. USDA APHIS VSISM and MRP Azure Cloud technical security controls are delineated in the current USDA APHIS VSISM System Security Plan.

VSISM can only be accessed by personnel who have logged in with their e-Authentication PIV or e-authentication username/password credential and have been authorized with specific VSISM role(s). If data is retrieved, no record of data queried is kept but individual must have user access and rights to access data. User access and changes to data are captured in audit logs. Users must be authenticated and have role based access to data which is limited on a need-to-know basis to the users business unit and teams (both state level access and commodity group).

Section 9.0 Technology

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

9.1 What type of project is the program or system?

The USDA APHIS Veterinary Services Integrated Surveillance Modules (VSISM) is a major application (MA) that collects, manages, and evaluates animal health data for disease management and surveillance programs.

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”?

OMB M-10-23 has been distributed by APHIS VS to the system owner and both have been reviewed..

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

Not applicable. USDA APHIS VSISM does not use third party websites or applications.

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

Not applicable. USDA APHIS VSISM does not use third 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?

Not applicable. USDA APHIS VSISM does not use third 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?

Not applicable. USDA APHIS VSISM does not use third 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?

Not applicable. USDA APHIS VSISM does not use third 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?

Not applicable. USDA APHIS VSISM does not use third 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?

Not applicable. USDA APHIS VSISM does not use third 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)?

Not applicable. USDA APHIS VSISM does not use third party websites or applications.

10.10 Does the system use web measurement and customization technology?

Not applicable. USDA APHIS VSISM does not use third party websites or applications.

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

Not applicable. USDA APHIS VSISM does not use third party websites or applications.

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.

Not applicable.



Responsible Officials

Orlando Baca
System Owner
United States Department of Agriculture

Approval Signature

Orlando R. Baca
System Owner
Animal Plant Health Inspection Service
United States Department of Agriculture

Preston Griffin
MRP Information System Security Program Manager
Animal Plant Health Inspection Service
United States Department of Agriculture

Tonya G. Woods
Director, Freedom of Information Office
APHIS Privacy Officer
Animal Plant Health Inspection Service
United States Department of Agriculture