

# Privacy Impact Assessment APHIS eFile

Policy, E-Government and Fair Information Practices

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**Privacy Impact Assessment for the  
APHIS eFile System  
June 2023**

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## Abstract

This Privacy Impact Assessment (PIA) is for the U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) eFile system. APHIS eFile system provides a web-based tool that enables the public to apply for, check status of application(s), and receive APHIS permits on-line. This PIA is being conducted to determine the potential impact of the data which is collected via APHIS eFile.

## Overview

The Animal and Plant Health Inspection Service (APHIS) of the United States Department of Agriculture (USDA) is charged with protecting the health and value of American agriculture and natural resources from the introduction of destructive plant and animal diseases and pests. These efforts support the overall mission to protect and promote agriculture and natural resources.

APHIS eFile consists of a set of secure Web-based interfaces on the Salesforce platform, which include permit application interface that supports the entry, update, submission, and tracking of APHIS permit applications by the public. It also contains an interface that supports regulatory processing and issuance of said permits by APHIS staff.

In short, APHIS eFile:

- Provides a Web-based tool that enables the public to apply for, check status of application(s) and receive APHIS permits on-line.
- Supports the electronic issuance of permits.
- Enables APHIS users and officials in DHS to obtain rapid verification of the authenticity and accuracy of an import permit.
- Standardizes the public interface to the APHIS permitting process.
- Enhances the integrity and efficiency of the APHIS permitting process.
- Support on-line credit card payments through Pay.gov

Customers enter permit application information directly into the system, check application status, and view permit responses. Customers also collaborate with the APHIS staff to verify accuracy of the permit and to ensure all requirements are met

## 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 system obtains the following general customer information:

- Name—full name, maiden name of the individual (if applicable), nickname or alias (if applicable),
- Telephone number—work, fax, and home numbers.
- Address—mailing address, email address, including organization name and job function.
- Personal Identification Number (PIN).
- Financial data—bank account numbers, check numbers, user fee accounts.
- Country of origin
- Names and contact information for cooperators or contracted employees
- Photographic image and identifying characteristics.
- Handwriting or an image of the signature.
- For permits that require fee payments, the system may contain information regarding payment amount, payment date, user fee account number, check number.

For Animal Care (AC) Animal Welfare Act (AWA) records, the system collects the following information:

- Licensing and Registrations records, including, name and business or address; tac identification number, customer number, license or registration certificate number, licensee and;
- Permit records, including, name, address, and the permittee health certificate

For Animal Care (AC) Horse Protection Act (HPA) records, the system collects the following information:

- Management records including, name, business, and/or home address,
- Transporter records including, the name and address, of the horse owner,
- Name and address of any person qualified to detect and diagnose a horse that is sore or to otherwise inspect horses for purposes of enforcing the HPA or the management of any horse show
- Designated qualified persons records (persons qualified to detect and diagnose a horse that is sore or to otherwise inspect horses for purposes of enforcing the HPA) including, the name, address, and number and class number;



- Compliance and regulatory correspondence records including, but not limited to, inspection findings, compliance, regulatory correspondence, investigations, enforcements under the HPA (as well as records related to administrative, civil, and criminal litigation), and other records required for regulatory purposes under HPA.
- Compliance records including, the name and address of a witness or person who has submitted a complaint concerning potential alleged violations and violations by persons who are subject to the HPA and nature of their complaint.

The system uses the following information about APHIS employees:

- Name, address, telephone number (and home numbers), email address,

For Biotechnology Regulatory Services (BRS) records, the system collects the following information:

- Contact information for suppliers and/or developers of organisms

For Plant Protection and Quarantine (PPQ) records, the system collects the following information:

- Contact information of applicant and permittee (all PPQ applications)
- ITEMS Violator case numbers for contacts (all PPQ apps)

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

Information for permit applications is received from permit applicants (importers, import brokers, preparers, and researchers).

Animal Care AWA information is received from the following:

- Applicant for a license registration or permit
- Licensee, registrant, or permittee
- Attending veterinarian
- Observations of APHIS inspectors
- APHIS Investigative and Enforcement Service officials
- Other persons who are responsible for or have information about the humane care of the animals.

Animal Care HPA information is received from the following:

- HIO and other entities that issue licenses
- HIO records submitted to APHIS
- Management of the horse show, exhibition, auction, or sale
- Horse management records submitted to APHIS

- Records submitted to APHIS by persons qualified to detect and diagnose a horse that is sore or otherwise inspect horses for purposes of enforcing the HPA
- Horse owner, trainer, custodian, rider, shipper, carrier, and transporter
- Witness or person who has submitted a complaint concerning potential alleged violations and violations by persons who are subject to the AWA or HPA
- APHIS employees Biotechnology Regulatory Services application data comes from the APHIS 2000 Application form.

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

The information obtained is used to obtain valid permits to manage the entry and movement of regulated articles. External users can determine permit requirements, apply for permits, track application status, and view permit responses. APHIS uses the information to verify the accuracy of the permit, ensure all requirements are met, and issue permits.

Animal Care staff uses the information to administer and enforce the AWA and HPA as outlined in Question 1.1.

### **1.4 How is the information collected?**

Users enter information directly into the eFile system through a portal, which serves as a single point of entry to apply and perform a variety of functions. BRS, VS and PPQ also manually enter applications on behalf of applicants.

### **1.5 How will the information be checked for accuracy?**

Applications are checked for accuracy in two ways. Some completeness checks are automated within the system, while others are manually built into the workflow process. For example, required fields ensure the applicant has entered data before the user can proceed to the next step in the application process.

Manual verification involves the following steps:

- The APHIS reviewer confirms in APHIS eFile that all information was received and is complete.
- If information is missing, the APHIS reviewer can request more information within the system.

Reviewers check accuracy against established USDA policies and procedures, and many steps within the workflow require automatic review by another APHIS user to verify its accuracy.

In addition, Animal Care information is checked for accuracy through data entry validation and audit reports prior to being released to the public. During inspections and audits, spot checks are conducted to validate the accuracy of records in the database.

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

The data collected in APHIS eFile is authorized under USDA APHIS regulatory policy and through the approval of the OMB forms that are represented electronically in APHIS eFile.

The Animal Welfare Act (AWA), 7 U.S.C. 2131 *et seq.*, and the regulations issued thereunder, 9 C.F.R. parts 1 through 4; as well as the Horse Protection Act (HPA), 15 U.S.C. 1821 *et seq.*, and the regulations issued thereunder, 9 C.F.R. parts 11 and 12.

The data collected for BRS Legal Authority comes from 7 CFR part 340. Under the updated regulations, the specific permitting authority comes from 340.5.

PPQ’s authority comes from the following:

Plant Protection Act (7 U.S.C. § 7701 *et seq.*), 7 USC 7711;  
OMB 0579-0085 and 0579-0471; Federal Seed Act (7 U.S.C. §§ 1551-1611, as amended);  
Honeybee Act (7 U.S.C. § 281 *et seq.*); and Agriculture Bioterrorism Act (7 U.S.C. § 8401);

VS’ authority comes from the following:

Animal Health Protection Act (7 U.S.C. § 8301 *et seq.*), 9 CFR Parts 93, 94, 95, 98, and 122.

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

The information collected could identify individuals and their activities with regards to APHIS permitting and there is a risk of exposure of this data. This information is protected through various levels of security and policy. The system itself is protected by role-based access controls and positive identification techniques to ensure that only people who are authorized to view information about others can do so. Risk is further reduced by requiring two factor authentication to log into the system. Personnel with access are required to complete annual USDA security awareness training which includes privacy training.

A notification is sent to the permittee via email after a license or permit is approved, which requires the permittee to log into eFile, where they can access only their information.

**Section 2.0 Uses of the Information**

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

## 2.1 Describe all the uses of information.

The data is used to manage and issue permits and notifications; perform inspections, investigations, and permit-related activities; prepare permits, letters, and other documents; generate reports to evaluate quality control and effectiveness of the program (these reports may include privacy data such as name and address); determine whether the action requested in the permit application would be subject to additional Federal or State authorities; and facilitate and account for payments.

In addition, for the purposes of Animal Care, the system collects PII information customers address, site address and contact phone number from individuals who import dogs into the United States for resale.

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

No tools are used to analyze data.

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

*Not Applicable - No commercial or publicly available data is used*

## 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.

This information is protected through various levels of security and policy. The system itself is protected by role-based access layers and positive identification techniques to ensure that only people authorized to view and act upon information contained in the system can do so.

Data is secured by various means of encryption and access control:

- Access to the application must be authenticated via USDA eAuth requiring user ID and password.
- Privileges and permissions assigned to enter, view, update, modify, or delete the information given to individual user account are based on an individual's job roles and responsibilities.
- All employees are required to take USDA role-based privacy training annually.
- Sensitive data is encrypted at rest and in transit.
- Security controls and proper redaction methods are placed on the inspection reports and research facility annual reports to prevent manipulation of the reports and unauthorized exposure of PII.



## 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?**

Paper and electronic records are retained in accordance with disposition authority NI-463-09-9, which is currently being updated. All records are considered as permanent and will be maintained in accordance with National Archives and Records Administration (NARA) requirements.

eFile permit data is maintained within Salesforce permanently.

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

No.

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

There are risks associated with permanence of the data retention. The data is encrypted, which mitigates the risk of exposure. Data is maintained and disposed of in accordance with APHIS records retention schedules (except where litigation and other holds apply), access control procedures, and APHIS Directive 3440.2 (DISPOSAL OF APHIS DATA CENTER COMPUTER ROOM MEDIA AND

EQUIPMENT POLICY), which outlines the appropriate procedures for disposing of media and data on media in a manner that makes it impossible to recover.

## 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?**

. Information may be shared with APHIS Enforcement Services as outlined below:

- Inspection findings and regulatory correspondence (including information related to the denial or termination of a license, and notices or advisories regarding alleged violations with the AWA, and information regarding compliance- and enforcement-

related activities, including copies of pre-litigation settlement agreements, stipulations, and records related to formal administrative enforcement proceedings).

- Information on USDA-certified HIOs, management of horse shows or other regulated events, and persons who are qualified to detect and diagnose a horse that is sore or otherwise inspect horses for the purposes of enforcing the HPA and the regulations thereunder.
- Information regarding any person who is under disqualification and therefore ineligible to participate in a horse event; the identity of all horses that a qualified person recommended to be disqualified or excused for any reason; and regulatory correspondence (including information related to the disqualification of a person from holding a license to detect soreness in horses, and notices or advisories regarding alleged violations or violations with the HPA), and information about compliance- and enforcement-related activities (including copies of pre-litigation settlement agreements, stipulations, and records related to formal administrative enforcement proceedings), in accordance with the HPA and regulations and to promote compliance.

Additionally, information may be shared with APHIS Legislative and Public Affairs to assist with an APHIS response to request for information in compliance with the Freedom of Information Act.

#### **4.2 How is the information transmitted or disclosed?**

Information sharing to enforcement officers is performed via a secure file transfer protocol to the United States Custom and Border Protection Automated Commercial Environment system. Other users such as Legislative and Public Affairs have access to the system via user access granted by the system owner.

#### **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.**

The information shared is protected through various levels of security and policy. The system itself is protected by role-based access layers and positive identification techniques to ensure that only those persons who are authorized to view and act upon the information can do so. By policy, individuals are only to access the information they need to perform their duties and should not share the information to anyone unless specifically authorized. All APHIS employees are required to undergo annual privacy awareness training. There is no risk to privacy as the data is encrypted, masked and has controlled access. Any user who no longer requires access, their account is deactivated internally.

## 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 shared with the Department of Homeland Security (DHS) Customs and Border Protection (CBP) agents who work to support the APHIS mission at various ports of entry. Additionally, limited permit data is sent to State Department of Agriculture employees for review, so that they may add state regulations to the final permit. Only external agencies and users which have a need to know such information in order to support the agencies mission are provided access to relevant data.

In addition to the 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:

- The name, city, state, license or registration type and/or status, or change of a licensee and registrant to any person pursuant to 9 CFR 2.38(c) and 2.127.
- Annual reports submitted to APHIS by licenses and research facilities to any person pursuant to 9 CFR 2.7 and 2.36.
- Inspection reports and other regulatory correspondences issued to licensees and registrants (from the agency) to any attending veterinarian in order to carry out duties under AWA pursuant to 9 CFR 2.33 and 2.40.
- The name, telephone number, other contact information, location, inspection reports, and regulatory correspondences of licensees, registrants, permittees, and applicants for the same to appropriate Federal, foreign, state, local, tribal, or other public authority agencies or officials, in order to carry out duties under the AWA or state, local, tribal, or other public authority on the same subject pursuant to 7 U.S.C. 2145(b).
- Inspection reports and permit status of licensees and registrants to any pet store or other entity that is required under state, local, tribal, or other public authority to verify a licensee, registrant, or permittee's compliance with the AWA.
- Information to the National Academies of Sciences, Engineering, and Medicine, and any other research institution engaged or approved by the Department to the extent APHIS deems the disclosure necessary to complete research and/or compile a report in the furtherance of the Department's mission.
- Final adjudicatory AWA and HPA decisions or order by an appropriate authority to any person.
- The name, city, state, or other information to the extent necessary for proper identification of persons (referred to as *designated qualified persons* or DQPs) who are or have been qualified to detect and diagnose a horse that is sore or otherwise inspect

horses for the purpose of enforcing the HPA and of horse industry organizations or associations (referred to as HIOs) that have currently or had in the past DQP programs certified by USDA.

- APHIS may disclose to any regulated horse owner, HIO, and other entities responsible for licensure or required to verify compliance with the HPA, HPA inspection findings and regulatory or other correspondence issued to persons or entities regulated under the HPA.
- The name, city, state, or other information to the extent necessary for proper identification of any person or entity who has been disqualified, suspended, and/or otherwise prohibited from showing or exhibiting any horse, or judging or managing any horse show, horse exhibition, horse sale, or horse auction under the HPA and the terms of such action.
- The name, city, state, or other information to the extent necessary for the proper identification of any regulated individuals or entity whose license or permit has been suspended, revoked, expired, terminated, or denied under the AWA and the terms of such action.
- Limited information about permits applied for and obtained by Applicants, via public report listings and data tables.

In addition, APHIS may disclose to appropriate law enforcement agencies, entities, and persons, whether Federal, foreign, state, local, tribal, or other public authority responsible for enforcing, investigating, or prosecuting an alleged violation or a violation of law or charged with enforcing, implementing, or complying with a statute, rule, regulation, or order issued pursuant thereto, when a record in this system 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 court order issued pursuant thereto, if the information disclosed is relevant to any enforcement, regulatory, investigative, or prospective responsibility of the receiving entity.

APHIS may also disclose to the Department of Justice (DOJ) when the agency, or any component thereof, or any employee of the agency in his or her official capacity, or any employee of the agency in his or her individual capacity where the DOJ has agreed to represent the employee, or the United States, in litigation, where the agency determines that litigation is likely to affect the agency or any of its components, is a party to litigation or has an interest in such litigation, and the use of such records by the DOJ 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 DOJ is a use of the information contained in the records that is compatible with the purpose for which the records were collected.

APHIS may disclose information from this system of records to the following:

- A court or adjudicative body in administrative, civil, or criminal proceedings when (a) the agency or any component thereof, (b) any employee of the agency in his or her

official capacity, (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 Government, is a party to litigation or has an interest in such litigation, and by careful review, the agency determines that the records are therefore deemed by the agency to be for a purpose that is compatible with the purpose for which the agency collected the records.

- Appropriate agencies, entities, and persons when (a) USDA suspects or has confirmed that there has been a breach of the system of records; (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.
- 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.
- USDA contractors and other parties engaged to assist in administering the program, analyzing data, and conducting audits. Such contractors and other parties will be bound by the nondisclosure provisions of the Privacy Act.
- USDA contractors, partner agency employees or contractors, or private industry employees to identify patterns, trends, or anomalies indicative of fraud, waste, or abuse.
- A Congressional office from the record of an individual in response to any inquiry from that Congressional office made at the written request of the individual to whom the record pertains.
- The National Archives and Records Administration or to the General Services Administration for purpose of records management inspections conducted under 44 U.S.C. 2904 and 2906.
- The National Finance Center and Treasury Department as necessary to carry out any and all functions within their jurisdiction, including but not limited to, processing payments, fees, and collections, penalties, and offsets.

**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.**

The information shared outside the Department is compatible with its original collection as it is used directly to monitor and enforce the regulations governing the issuance of permits. The SORNs which cover the appropriate routine use are, APHIS-08 and APHIS-10. Outside agencies that use the information assist the USDA in protecting and enforcing their policies at the various ports of entry across the United States and its territories.

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

External organizations, do not have direct access. Data is transferred via Mulesoft and Secure File Transfer protocol to CBP Automated Commercial Environment (ACE) System.

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

There is a risk of data being exposed while being transmitted externally, however that risk is mitigated by ensuring the data is encrypted and sent to DHS over secure file transfer protocol. There is also a risk of unauthorized access to the data in the system, which is mitigated by access controls limited only to authorized eFile users, managers, system administrators, database administrators, and other employees with appropriate access rights.

DHS Customer and Border Protection (CBP) does not have direct access to eFile as access is limited to internal users only to be able to monitor access controls more accurately.

Access to data is based on roles assigned on a need-to know premises. Role based security and access rights are implemented to protect the confidentiality of information. Role-based security includes the uses of USDA eAuthentication services, which provides user authentication. By policy, individuals can access only the information required to perform their duties and are not to share the information to anyone unless specifically authorized. No reports are shared externally.

## 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, eFile uses the following SORNs

- Animal Welfare Act and Horse Protection Act: APHIS-8  
<https://www.regulations.gov/document/APHIS-2011-0102-0001>
- APHIS Comprehensive Electronic Permitting System: APHIS-10  
<https://www.regulations.gov/document/APHIS-2006-0185-0001>

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

Yes. Prior to logging into APHIS eFile and providing information the user is required to acknowledge a privacy and security notice. This page also provides additional links that provide the user further information on their rights. The link is <https://efile.aphis.usda.gov/s/>.

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

*No*

**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 individual does not have the ability to consent (or opt out) of particular uses of the information collected in the system.

**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.**

Individuals are provided notice as to their rights and are required to acknowledge receipt of this notice in order to access the APHIS eFile system. A user must provide the requested information by first acknowledging they understand the information is being collected and used for the purposes of reviewing and issuing regulatory decisions regarding permit issuance.

## 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?**

Individuals may review their information online at eFile via <https://efile.aphis.usda.gov/s/>



Any historical information can be requested by submitting a request the groups listed on the APHIS eFile contact us webpage (<https://www.aphis.usda.gov/aphis/banner/help/efile/efile-contacts>).

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

Prior to submission, users may self-correct any issues. After submission, users may refer to the USDA APHIS eFile contact page to request a correction to erroneous information. In some cases, APHIS eFile program support may contact the user and request that they send additional information to correct deficient or erroneous information via, <https://www.aphis.usda.gov/aphis/banner/help/efile/efile-contacts>. After issuance, applicants may also submit an amendment application to correct information on their permit.

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

Users are provided with information on who to contact for assistance with correcting their information. Help Links can be found via <https://www.aphis.usda.gov/aphis/banner/help/efile/efile-help>. In the alternative, Users can [submit a request to the Privacy Act Office as defined in Section 7.2](#).

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

Formal redress is provided.

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

The risks associated with the redress could include, but is not limited to misuse of data, loss of data, inadvertent release of data, and identity theft. Risks are minimal by limiting accessibility to data by minimizing when and how access is given.

## **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?**



An eFile security matrix is used for user control access. This matrix houses information pertaining to the different roles, licenses and user public group information. Once a request is received from a program subject matter expert, APHIS Digital Services and Enterprise platform (DSEP) uses the security matrix to apply the appropriate user access controls. DSEP manages all accounts within APHIS eFile. These accounts are reviewed quarterly to ensure account viability.

**8.2 Will Department contractors have access to the system?**

Yes. Those individuals must first obtain relevant security clearances along with specific authorization to access information at various levels.

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

All APHIS employees and contractors who have access to the system are required to take the USDA Information Security Awareness Training both for initial access and on an annual basis. Failure to complete training results in access being revoked.

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

Yes. APHIS eFile has completed Assessment and Authorization (A&A) on March 23, 2022, and is now in continuous monitoring, which requires an annual review.

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

All users are required to have an individual user account to access the system and are eAuthenticated. Auditing is enabled within APHIS eFile, and all required data fields and auditable events are monitored to ensure traceability of data. APHIS eFile utilizes robust authentication and authorization and physical access control, firewalls (access control), and intrusion detection systems prevent unauthorized access and misuse of data. APHIS eFile utilizes audit trails to track data inserts and edits for all major data elements and tables within the system. Below is user system activity that is audited and is maintained for numerous years:

- Records created or modified associated with inspections
- User interactions in a workflow

**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?**

The privacy risks associated with APHIS eFile during information sharing is limited to unauthorized sharing and mishandling of shared data. Auditing is enabled at the database and web application level which creates logs which detail objects accessed by user. Role-based access controls are enabled to provide least privilege. Secure Socket Layer (SSL) is used to protect data being transferred over the wire.

System credentials which support system access control are protected using strong one-way hash. Passwords are obscured while users input their credentials to access the system.

## 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?**

APHIS eFile is a cloud-based information system hosted on the Salesforce platform.

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

The system does not utilize any technologies that would raise the privacy risk.

## 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 3<sup>rd</sup> party websites and/or applications?**

Not applicable, no 3<sup>rd</sup> party websites and/or applications are used.

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

APHIS eFile does not use third-party websites and/or applications.

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

APHIS eFile does not use third-party websites and/or applications.

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

APHIS eFile does not use third-party websites and/or applications.

**10.6 Is the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications purged periodically?**

APHIS eFile does not use third-party websites and/or applications.

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

APHIS eFile does not use third-party websites and/or applications.

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

APHIS eFile does not use third-party websites and/or applications.

**10.9 Will the activities involving the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications require**



**either the creation or modification of a system of records notice (SORN)?**

APHIS eFile does not use third-party websites and/or applications.

**10.10 Does the system use web measurement and customization technology?**

No

**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?**

N/A

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

APHIS eFile does not use third-party websites and/or applications.

## Responsible Officials

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Ashok Anant  
Digital Services Branch Chief  
United States Department of Agriculture



## Approval Signature

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Janelle Jordan  
APHIS Privacy Act Officer  
Animal and Plant Health Inspection Service  
United States Department of Agriculture

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Angela Cole  
Chief Privacy Officer/Deputy Assistant Chief Information Security Officer  
Marketing and Regulatory Programs  
United States Department of Agriculture