

Privacy Impact Assessment Template

Policy, E-Government and Fair Information Practices

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Privacy Impact Assessment for the NCAH on Azure Platform (NAP)

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Abstract

The purpose of the NCAH on APHIS Platform (NAP) system security plan is to assess and authorize all of the National Centers for Animal Health (NCAH) mission capabilities residing on the Animal and Plant Health Inspection Service (APHIS) Enterprise Infrastructure (AEI) general support system (GSS). The NCAH is located in Ames, IA and Plum Island, NY.

NAP supports the following mission capabilities:

The **NCAH Quality Management (NQM)** system is owned by Animal and Plant Health Inspection Service (APHIS), Veterinary Service (VS), Science Technology and Analysis Services (STAS), National Veterinary Services Laboratories (NVSL). NQM is a quality management system (QMS) that provides a software suite of compliance focused tools that supports the NVSL requirement to maintain compliance to applicable regulations and standards. This Privacy Impact Assessment (PIA) is being conducted as part of maintenance, assessment, and authorization.

The **Warehouse, Inventory Management and Procurement System (WIMPS)** is an enterprise-level electronic information management system managing two warehouses in Veterinary Services (VS). These warehouses store routine office supplies and consumables used by investigative, scientific and support staff conducting research, investigative activities, animal disease and biologic testing. The users of this system rely heavily on having a quick response when disease outbreaks are observed. This information system allows VS to:

- Receive packages
- Report costs
- Maintain and rotate inventory
- Shipping supplies for diagnostic testing of animal disease, animal health emergencies and routine livestock surveillance.
- Ship veterinary supplies necessary for animal health to stakeholders inside and external to USDA

This privacy impact assessment is being conducted to assess the storage of PII for stakeholders external to the USDA who contribute to the nation-wide animal health programs.

Overview

NCAH Quality Management (NQM) supports the regulatory compliance needs of the APHIS Veterinary Services (VS) Science Technology and Analysis Services (STAS), National Veterinary Services Laboratories (NVSL) and its scientific laboratory activities. NQM is an industry leading quality management system (QMS) that provides a software suite of compliance focused tools. As a web based (internal facing) and paperless system NQM supports the NVSL requirement to maintain compliance to applicable regulations and standards.

The NQM provides automated, streamlined management of:

- Product and compliance documents control
- Product customer complaints
- Process change control
- Process corrective and preventive action (CAPA)



- Training (non-AgLearn based)
- Audits
- Other quality management business processes

Information in the system includes procedures, standard operating procedures (SOPs), policies, work instructions (WI), references, manuals, and forms. NQM is used to ensure the most current version of a document is used for internal work processes, from scientific laboratory procedures to administrative procedures. Procedural training records, technical corrective actions, and auditing information will be stored in NQM. Additionally, the NQM is to ensure the compliant operation, maintenance, and repair of NVSL owned laboratory equipment with the purpose of maintaining the Laboratories' certificates. This includes tracking the training accomplishments of NVSL, which are needed to operate the NVSL owned laboratory equipment, laboratory processes and administrative processes.

Information is manually share from VS Laboratory Information Management System (VS LIMS) when a customer complaint potentially identifies a technical process in need of corrective or preventative action. The VS LIMS information will include PII on the animal owner or private citizen acting in a complimentary role to the owner.

Corrective and preventative action (CAPA) is the only portion of NQM that contains PII.

The NQM is a child of NCAH Azure Platform (NAP) and categorized as a “Moderate” system.

The **Warehouse, Inventory Management and Procurement System (WIMPS)** is an enterprise-level electronic information management system managing two warehouses in Veterinary Services (VS). These warehouses store routine office supplies and consumables used by investigative, scientific and support staff conducting research, investigative activities, animal disease and biologic testing. The users of this system rely heavily on having a quick response when disease outbreaks are observed. Additionally, the facilities store routine office supplies and consumables.

The information system stores information necessary to identify items, identify the package recipient inside of USDA, and non-USDA employee ship-to information. Ship-to information is shared with UPS and FedEx to deliver vaccines and other animal health emergency supplies. During a typical transaction, office or laboratory supplies are order from the supplier and received at the warehouse to be transferred to the final recipient. The entire lifecycle is support to ensure the paper and printer ink are received by the office worker, and that gloves, solvents and pipettes are received by the laboratory worker. The second typical transaction is when USDA identifies and ships to suitable recipients supplies for diagnostic testing of animal disease, animal health emergencies, and routine livestock surveillance. Recipients are both USDA and external to USDA. Ship-to information is share with FedEx and UPS to successfully deliver the USDA supplies.

WIMPS is operated under the authority of Homeland Security Presidential Directive 9 and Animal Health Protection Act.

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?

NCAH Quality Management:

Information maintained includes laboratory and administrative documents, procedures, policies, instructions, references, manuals, forms, audits, calibration results, and reports. Specific information about individuals may include:

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 (animal) information

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

USDA Government Employee:

- Employee Name
- Employee Business E-mail
- Employee Organizational Group
- Employee's Supervisor

Employee information is maintained to determine current contact information as well as access requirements. A history of this information is maintained via the COTS Master Control audits. Employee information contained in the database is only job-related (e.g. name, position, job email).

WIMPS:

This information system maintains the following information:

- Shipping Address
- Contact Name
- Contact Phone Number
- Contact e-mail
- Order Information
- Premises Identification Number
- USDA Employee Name
- USDA Phone Number
- USDA e-mail
- USDA Component, Agency, & Office
- Ship-to-USDA Address
- USDA Employee Signature
- USDA Employee's Supervisor
- USDA Employee's Supervisor USDA e-mail

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

NVSL sources of information in the NQM include:

Laboratory and administrative documents, standard operating procedures (SOPs), policies, work instructions (WI), references, manuals, forms, laboratory audits (internal audits of laboratory activities, administrative procedures, calibration), and corrective action & preventive action (CAPA) reports.

NVSL Employee information is provided by the individual's supervisor, APHIS 513 form, internal APHIS organizational charts, and LDAP account creation documentation.

PII collected in VS LIMS can be moved to NQM when a complaint is submitted and follows the CAPA process. NVSL employees manually upload or manually enter information from VS LIMS to NQM may include information from State and private veterinary diagnostic laboratories, private veterinary practitioners, Federal meat inspectors, Federal field veterinarians, and others. In addition, VS LIMS information includes laboratory samples from other countries for import cases and for cases where diagnostic assistance is requested.

The sources of information in the WIMPS include:

- USDA employee
- USDA supervisor
- USDA active directory
- USDA/APHIS District office directors

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

NCAH Quality Management:

The information is maintained in NQM to maintain compliance with the Laboratories' accreditation. Collecting the information listed in Sections 1.1 and 1.2 of this document helps automate, streamline, and manage the following under a single web based platform:

- document control
- document change control
- training control (non-Aglearn related training certificates)
- audits (internal audits of laboratory activities, administrative procedures, calibration, management systems compliance)
- CAPA (Corrective Action & Preventive Action)
- other quality management business processes



Laboratory and administrative documents, SOP, policies, WI, references, manuals, forms, laboratory audits, and CAPA are maintained through subsequent revisions for the benefit of document owners and knowledge retention.

Non-PII animal or sample information is disseminated to DHS, DHS contractors, State, university, international, or other collaborating laboratories consistent with the support of safeguarding animal health.

Any information, to include PII, may be included in the artifacts submitted to the accreditation bodies in order to continue the government's accreditation of NVSL.

Information may also be disseminated in response to a Freedom of Information Act (FOIA) request.

WIMPS:

The information is being maintained in WIMPS to ensure the successfully receipt and delivery of packages, and to track the funding for those packages.

1.4 How is the information collected?

NQM:

Employee information is provided by the individual's supervisor, APHIS 513 form, internal APHIS organizational charts, and LDAP account creation documentation. Information as described in Sections 1.1 and 1.2 is APHIS employee generated/created within the NQM application. The *Sample*, *Establishment*, and *Testing* information listed in Section 1.1 is collected from VS LIMS when a customer submits a complaint to the NVSL.

WIMPS:

USDA employee information is collected from the supervisor, USDA active directory. Non-USDA ship-to information is collected from the APHIS District offices.

1.5 How will the information be checked for accuracy?

NQM:

Employee information is validated by the individual's supervisor through the use of an APHIS 513 form, digitized in the User Management System (UMS).

Information as described in Sections 1.1 and 1.2 is checked for accuracy via peer review (subject matter experts), quality and document managers, and the employee's supervisor. After the employee's supervisor approves the document, the document is then sent to the appropriate Program quality manager for final review/authorization.

WIMPS:

USDA information is validated by the supervisor and through periodic review of the USDA active directory. Non-USDA ship-to information is validated by the APHIS District offices.

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

Specific legal authorities for both NQM and WIMPS include:

NVS was established under the authority of the Homeland Security Presidential Directive 9 (HSPD-9) which established the NVS in 2004.

CVB enforces the Virus-Serum –Toxin Act (21 USC §151-159 et.seq.)

NVSL provides testing under: 9 CFR 53 (Foot-And-Mouth Disease, Pleuropneumonia, Rinderpest, and Certain other communicable Diseases of Livestock or Poultry); 9 CFR 56 (Control of H5/H7 Low Pathogenic Avian Influenza); 9 CFR 82 (Exotic Newcastle Diseases and Chlamydiosis) and 9 CFR 94 (Rinderpest, Foot-and-Mouth Disease, Exotic Newcastle Disease, African Swine Fever, Classical Swine Fever, Swine Vesicular Disease, and Bovine Spongiform Encephalopathy: prohibited and restricted importations)

Under the authority of the Animal Health Protection Act (7 USC Chapter 109), Animal Welfare Act (7 USC 54), Homeland Security Presidential Directives (HSPD) 5 (Management of Domestic Incidents); HSPD 7 (Critical Infrastructure Identification, Prioritization, and Protection); HSPD 8 (National Preparedness); HSPD 9 (Defense of United States Agriculture and Food) & HSPD 12 (Policies for a common Identification Standard for Federal Employees and Contractors)

NADC (ARS) as authority under:

The Organic Act of 1862 (7 U.S.C. 2201 note), Agricultural Research Act of 1935 (7 U.S.C. 427), Research and Marketing Act of 1946 (Pub. L. 79-733), as amended (7 U.S.C. 427, 1621 note), Food and Agriculture Act of 1977 (Pub. L. 95- 113), as amended (7 U.S.C. 1281 note), Food Security Act of 1985 (Pub. L. 99-198) (7 U.S.C. 3101 note), Food, Agriculture, Conservation, and Trade Act of 1990 (Pub. L. 101-624) (7 U.S.C. 1421 note), Federal Agriculture Improvement and Reform Act of 1996 (Pub. L. 104-127), Agricultural Research, Extension, and Education Reform Act of 1998 (Pub. L. 105-185), and Farm Security and Rural Investment Act of 2002 (Pub.L. 107-171).

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

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

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

Improper disclosure of privacy data is mitigated through approved system access that is limited to NVSL Quality Assurance employees. User access is requested, reviewed, and documented on APHIS form 513. User access is recertified annually. Access is limited to USDA employees, and contractor access is not provided.

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.

National Centers for Animal Health (NCAH) on Azure Platform (NAP) is a moderate system and contains NQM and WIMPS.

NQM:

information is used to maintain compliance with ISO accreditation. Additionally, the information is used to help automate, streamline and manage the following under a single web based platform:

- document control, change control
- training control (non-Aglearn related training certificates)
- audits (internal audits of laboratory activities, administrative procedures, calibration, management systems compliance)
- CAPA (Corrective Action & Preventive Action)
- customer complaints
- other quality management business processes

The PII maintained in the system is used to correct processes and prevent future actions that may be the root cause of future complaints.

WIMPS:

Information is used by APHIS VS to order, track, ship, and manage warehouse inventory distribution to both USDA and non-USDA customers.

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

NQM:

NQM commercial off the shelf (COTS) software Master Control contains pre-defined and customized reports. The data contained in the reports is used to automate and streamline document and change control. This includes (but is not limited to):

outstanding training, ownership of documents, documents assigned to individuals/groups, pending CAPA reports/review, etc.

WIMPS:

Contained within the WIMPS, the Integrated Sales Analysis Tool (Business Intelligence module) integrates IBM Cognos to generate reports from the data contained in the system. Reporting consists of cost and logistical data for supplies of high volume biologic testing. Other reports can be created to determine usage metrics for users, storage information, processing, historical order information, and inventory preparation based on previous needs.

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

NQM:

The system uses publicly available ISO accreditation requirements (to maintain ISO accreditation), A2LA (an accrediting body with additional requirements that is used for clarification/guidance of ISO requirements), equipment manuals and vendor websites (for instrumentation), and also scientific journal articles for scientific test validation.

WIMPS:

The WIMPS 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 customer and employees will be protected by USDA APHIS VS STAS NVSL management. NQM COTS Master Control also has security controls to address access to and security of information.

- Access to the data in the system is controlled and documented by formal authorization
- All access to the system is limited by account identification and password
- Users have formal training in how to use the system
- Users have formal training on how to properly manage PII
- A warning banner must be acknowledged at login

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?

NQM:

Paper records are retained indefinitely for COOP purposes. Electronic data is maintained varies based on the information source and guiding directive (ISO, Federal, USDA Policy, etc).

WIMPS:

Electronic information is maintained 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. Data retention periods have been submitted and aware awaiting final approval by NARA. NQM and WIMPS have separate scheduled submitted.

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. NQM uses role based access to mitigate this risk. The Login interface reminds users of their responsibility every time they log in. In addition, given the length of time data is retained in the information system (WIMPS specifically), unauthorized access to this data is the privacy risk. This is mitigated by using capabilities common to USDA and the commercial products used.

This includes:

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

Section 4.0 Internal Sharing and Disclosure

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

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

NQM:

Information is shared with USDA ARS employees. Agricultural Research Service (ARS) employees can login to NQM but cannot access PII. PII data extractions are not shared with ARS employees.

Animal procedures, work instructions, and forms are shared with USDA ARS employees located at the USDA NCAH in Ames, IA. Information is also shared with USDA ARS employees co-located with NVSL at the Foreign Animal Disease Diagnostic Laboratory (FADDL) in Plum Island, NY. PII contained within NQM is not accessible by USDA ARS employees and this is enforced by their user role.

WIMPS:

No information is shared internally. The system is used by APHIS and ARS to conduct business. ARS and APHIS employees have access and access controls are in place.

4.2 How is the information transmitted or disclosed?

NQM:

Requested information or forms are sent in hard-copy or digital format via e-mail. ARS employees can alternatively login to NQM based on their need but cannot access PII.

WIMPS:

No data is transmitted or disclosed.

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.

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

- All information sharing with internal systems is done manually over the internal APHIS network. (VS LIMS data is manually added to NQM.)
- Access to the data in the systems (NQM and USDA email) is controlled and documented by formal authorization
- All access to the system is limited by account identification and eAuthentication. The eAuthentication makes uses of Personal Identification Verification (PIV) cards using associated certificates.
- Users have formal training in how to use the system
- A warning banner must be acknowledged at login

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?

NQM:

Information is shared with the following external entities. When information is shared that contains PII, the PII shared is listed in Section 1.1:

- Contractor or DHS employees located at PIADC (Plum Island Animal Disease Center) in Plum Island, NY. This group does not have access to QM and does not receive PII data extractions.
- Contracted vendors for ISO accreditation and registration. Information shared includes SOPs, work instructions, CAPAs, etc. for the purpose of ISO accreditation. This group does not have access to NQM. Artifacts used to document accreditation related to customer complaints may contain PII data extractions.
- State and international laboratories, universities, and other entities for collaborative purposes and cooperative agreements. This group does not have access to NQM and does not receive PII data extractions.
- International entities to establish testing capacity in other countries. This enables consistent processes/procedures to support the mission of safeguarding animal health. This group does not have access to NQM and does not receive PII data extractions.

WIMPS:

Information is shared with FedEx and UPS. Name, address, and phone number is shared. This information is shared for package delivery to the ship-to address.

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.

NQM:

The PII information shared outside of the Department is compatible with the original collection. The PII accompanies the customer's complaint with the intent of resolving the issue and avoid reoccurring issues for the customer. The NVSL quality manager's validate this outcome; the ISO accreditation organization ensures NCAH are following the procedures we have set forth to maintain accreditation. This organization is named contracted activity cleared for access to USDA data and are bound by a confidentiality agreement.

Department contractors who are vendor employees can be provided access to NQM for troubleshooting purposes and maintenance. This vendor is named contracted activity cleared for access to USDA data and are bound by a confidentiality agreement.

APHIS SORN 19 is being updated to clearly make notification of the movement of PII from VS LIMS to NQM as described in this assessment.

WIMPS:

The sharing of information is compatible with the reason it was collected. Animal owners and others share this information in order to receive no-cost animal disease and biologic testing material. These animal owners and others rely heavily on having a quick response when disease outbreaks are observed.

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

NQM:

The contracted vendors for ISO accreditation and registration described in Section 5.1 must pass through NCAH campus' physical security, are covered by a non-disclosure agreement, and are only provided escorted access to view records potentially containing PII. Vendor specific technical support may potentially view records containing PII during the investigation of a technical incident or software defect. Vendor technical support is covered by a non-disclosure agreement and secure email is used to transmit information and communicate back and forth in order to resolve the technical issue.

WIMPS:

The information is printed on the outside of each box. The information is transmitted to FedEx or UPS when the package pick-up is requested.

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

NQM:

Uses of information are in accordance with the stated purpose and use of the original collection of a customer complaint by VS LIMS. The privacy risks are limited to the minority of customer complaints that originate from an incident in VS LIMS and also contain PII. The other uses of information listed in Section 1.3 do not contain PII. The privacy risk is the mishandling of PII in customer complaints. To mitigate this access to NQM must be explicitly authorized and the application is protected by the following measures:

- All access to the system is limited by username and password.
- Application limits access to relevant information by assigned application functions to roles. Additionally, NQM has areas within the application (called "vaults") where specific documents, information, and processes can be

controlled at a user-specific level. This prevents access to unauthorized information.

- Access to NQM is internal to USDA APHIS staff.
- The USDA warning banner must be acknowledged at application login.

WIMPS:

The information is printed on the outside of each box. The information is transmitted to FedEx or UPS when the package pick-up is requested. This shared information must be provided to successfully deliver the animal disease and biologic testing material. This cannot be mitigated.

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.

NQM:

Yes. APHIS SORN-19. <https://www.ocio.usda.gov/sites/default/files/APHIS-19.txt>. Updates to the SORN are being processed, found under POAM 30015, under CSAM ID 2464 (VS LIMS).

WIMPS:

Yes, NAP POA&M 29876 has been created to document this deficiency.

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

NQM:

Yes. The information shared from VS LIMS was included in SORN 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>

WIMPS:

A SORN will be developed and published and a Privacy Notice will be created.

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

NQM:

No, individuals external to NVSL that submit samples to be tested at the laboratory must submit all data required by VS LIMS 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. Individuals do not have the opportunity to decline to have their information shared outside of VS LIMS should their submitted information be moved to a complaint in NQM.

WIMPS:

No. If individuals do not provide the information then they will not receive the supplies requested.

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

NQM:

No, the NQM submitters' data are treated uniformly. Only information that is cleared through the Freedom of Information Act is available for use.

WIMPS:

No. The information is used for only one purpose within the WIMPS

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.

NQM:

Information is not collected with NQM. Data are collected using VS LIMS with the individual's knowledge, and data are voluntarily submitted to the laboratory along with test samples.

WIMPS:

At this time a SORN is pending for the WIMPS. Once the SORN is published a Privacy Notice will be created.

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?

NQM:

If an employee discovers inaccurate information in NQM, they can contact the NVSL Quality Management (QM) unit.

WIMPS:

Persons listed as the ship-to address can correct their information any time through the USDA District Office.

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

All USDA employees are notified of the procedures to correct information by their human resource department.

WIMPS:

Persons listed as the ship-to address are typically in contact with USDA throughout the entire disease outbreak. Persons listed as the ship-to address can contact the USDA district office at any time to address shipping concerns or correct their information.

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

A formal process is available to correct any data inaccuracies. See section 7.3 for more information.

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?

Both systems utilize the User Management System (UMS) to assist in the submission and tracking of users. A Supervisor can submit an employee for access to the system. Once the application is reviewed the applicable NQM and WIMPS administrators are notified of additions. Every Quarter one quarter of the accounts are reviewed for accuracy.

NQM:

Access is based on the need to do business and is determined by USDA APHIS VS management. All access to the NQM application is authorized and documented by an APHIS 513 form.

WIMPS:

At NCAH, user access is initiated by an USDA employee's supervisor request, is approved by the system owner in NVSL, or the NVS Logistics Chief, and is recorded on APHIS form 513. Ordering clerks at district offices must first have an eAuth account prior to requesting access for placing orders.

8.2 Will Department contractors have access to the system?

NQM:

Department contractors can be provided access to NQM for troubleshooting purposes is that need arises. The contractor's access will be evaluated during the user certification process for NQM.

WIMPS:

No contractors have access.

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 NQM and WIMPS 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. The standard USDA 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?

Yes. The NAP system established an Authority to Operate (ATO) on May 10, 2017 and is categorized as a “Moderate” system. The system re-accreditation is set to renew the ATO in May 2020.

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

NQM:

Technical safeguards and auditing measures are in accordance with FIP 199/200 Moderate Baseline Security Controls. Some of the technical safeguards for NQM are 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 deletion, and user login activity are audited at the field level. In addition, 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 for access to the data within NQM is through role-based access and data restriction configurations. Furthermore, views and field-level access are role-based, preventing users from seeing, accessing, and/or making changes to individual fields or records they do not have access to. NQM users must be validated against APHIS Active Directory for authentication.

- All access to the data in the system is controlled by formal authorization using UMS.
- All access to the system is limited by account identification and eAuthentication. The eAuthentication makes uses of PIV cards using associated certificates.
- Warning banner must be acknowledged before logging in.
- All information sharing with internal systems is done over the internal APHIS network.
- Auditing is enabled both at the application and database level.

WIMPS:

USDA Active Directory (AD) provides authentication and identity services for this information system. All users must have active AD accounts, and AD provides a technical safeguard to WIMPS. This information system includes an Oracle database for data storage as well as auditing. All objects in the information system are audited, normal and privileged user actions are audit, and all audit logs written to the database are analyzed and archived.

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?

NQM:

The privacy information collected and stored in NQM is at risk from improper handling during transit. This risk is mitigated through user training and limiting use to Federal owned networks. Users are trained at least annually. Information is limited to APHIS, ARS, or DHS systems.

WIMPS:

All of the information stored in this information system is available outside of this information system. The integrity of the data is protected to ensure all transaction are complete and all items shipped successfully. All data objects, transactions, and ship-to data are protected by the available USDA technology and services (Oracle and Active Directory). Audit logs are available for all transactions.

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?

NQM:

Is quality management system (QMS) commercial, off the shelf software (COTS) that provides a software suite of compliance focused tools that supports the NVSL requirement to maintain compliance to applicable regulations and standards.

WIMPS:

Is a supply chain solution COTS provided by Tecsys software.

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

N/A – Neither NQM or WIMPS employ technology that 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 OMB memorandums listed above.

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

N/A

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

N/A

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

N/A

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?

N/A

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

N/A

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

N/A

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?

N/A

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)?

N/A

10.10 Does the system use web measurement and customization technology?

N/A

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 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.

N/A



Agency Approval Signature

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