



USDA Privacy Impact Assessment

Fiscal Year 2024

Privacy Division (PD)
Cybersecurity and Privacy Operations Center (CPOC)
U.S. Department of Agriculture

Revisions

Date	Version	Notes
09/06/2023	1.0	Documented created.
02/12/2025	1.1	Removed “Gender” and “Sexual Orientation” from Biographical Information in accordance with Executive Order 14168, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government.”

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Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	APHIS Salesforce: Agricultural Trade Licensing & Attestation (ATLAS)
Program Office	MRP
Mission Area	AMS
CSAM Number	2243
Date Submitted for Review	March 12, 2026

Mission Area System/Program Contacts

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Abstract

The abstract provides the simplest explanation for the “what does the system do?” and will be published online to accompany the PIA link.

The Agricultural Trade Licensing & Attestation (ATLAS) system is used by the USDA Agricultural Marketing Service (AMS) to facilitate the issuance of various types of trade documentation and certificates between businesses and the government involving the trade and management of agricultural and plant products. The documentation includes import and export certificates for foreign trade of U.S. agricultural products and intellectual property certificates for dairy products. The system facilitates the application for and the issuance of these certificates and documentation. ATLAS collects the personal information of individuals who are submitting applications and receiving certificates and documentation on behalf of their organizations, including their name, business address, business phone number and business email address.

Overview

The overview is the most important section of the PIA. A thorough and clear overview gives the reader the appropriate context to understand the responses in the PIA.

ATLAS is primarily used for the storage and access to the official trade documentation used by customers and foreign trade representatives. USDA staff review and approve or reject export certificates and submit billing information to the Financial Management Modernization Initiative (FMMI) system, USDA’s financial management system for processing official bills and payments of the user fee activities.

The information required to issue a certificate is business information such as the applicant/consignor/consignee business name, address, phone/fax number, origination location, destination, and shipping details such as container number and ship identification. Additional information is collected to identify the product being exported such as the business manufacturing the product, identifying product details, and storage requirements. All information collected is used to create the official export certificate and confirm the consignment is acceptable for shipment into the destination country. The data from the export certificates, including the PII of the applicants, will be shared with the European Union’s regulatory authority's electronic system. ATLAS contains information of around 1,000 individuals. The information collected in ATLAS is authorized under the Agricultural Marketing Act of 1946.

Section 1: Authorities and Other Requirements

The following questions are intended to identify all statutory and regulatory authority for operating the project, including the authority for collection, what SORN applies, if an ATO has been completed and if there is Paperwork Reduction Act coverage.

1.1. What legal authorities and/or agreements permit the collection of information by the project or system?

The Agricultural Marketing Act of 1946 (Act) amended on February 7, 2014, provides the authority in Section 202 and 203 to aid in the distribution of agricultural products in the United States and other countries. The Act further states to attain these objectives through cooperation among Federal and State agencies, producers, industry, organizations, and others in the development and effectuation of research and marketing programs to improve the distribution process. In October 2020, U.S. Food and Drug Administration (FDA) and the USDA signed a Memorandum of Understanding (MOU) that will enable the agencies to take a concerted, modern approach to support the export of U.S. milk and milk products worldwide.

The FDA is charged with the enforcement of the Federal Food, Drug, and Cosmetic Act (FFDCA) and other laws. In fulfilling its responsibilities under the FFDCA, FDA's activities are directed toward protecting the public health by ensuring that foods, including milk and milk products, are safe, sanitary, wholesome, and truthfully labeled. FDA has the authority to establish regulatory standards, inspect facilities, and take action if there are violations, but it is primarily the responsibility of industry to ensure food products are safe and meet applicable regulatory FDA requirements.

USDA-AMS, under the authority of the Act, carries out certain voluntary service functions designed to aid in the efficient marketing of agricultural products. These include developing commercial grade standards and specifications for foods, furnishing auditing, inspection and grading services (including the issuance of certificates of quality and/or condition) and auditing reports to producers, processors, shippers, buyers, or other interested parties. The major purpose is to assist producers in preparing quality wholesome products that meet users' requirements and to provide objective information concerning the grade, quality, or condition of a product, which will assist interested parties engaged in marketing functions. In addition to inspection and grading services for products, AMS offers voluntary audit, survey, and verification services at product locations and facilities.

1.2. Has Authorization and Accreditation (A&A) been completed for the system?

Yes. The following are specifics of the current status:

- The Security Plan Status: Current
- The Security Plan Status Date: 8/17/2025

- The Authorization Status: ATO
- The Authorization Date: 1/13/2026
- The Authorization Termination Date: 1/13/2029
- The Risk Review Completion Date: 12/4/2025
- The FIPS 199 classification of the system (LOW/MODERATE/HIGH): MODERATE
- This data is inherited from parent system APHIS Salesforce [2243]

1.3. What System of Records Notice(s) (SORN(s)) apply to the information?

A SORN is not required for this system as information and records are only looked up by a business identifier (business name or internal account number).

1.4. Is the collection of information covered by the Paperwork Reduction Act?

Yes, the collection of information is subject to OMB No. 0581-0283.

Section 2: Characterization of the Information

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

- 2.1. What information is collected, used, disseminated, or maintained in the system/program?

PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Mark all applicable PII and data elements in the table.

Please check any information listed below that your system collects, uses, disseminates, creates, or maintains. If additional sensitive PII is collected, used, disseminated, created, or maintained, please list those in the text box below:

Identifying Numbers

- | | | |
|---|--|--|
| ☐ Social Security number | ☐ Truncated or Partial Social Security number | ☐ Driver's License number |
| ☐ Passport number | ☐ License Plate number | ☐ Registration number |
| ☐ File/Case ID number | ☐ Student ID number | ☐ Federal Student Aid number |
| ☐ Employee Identification number | ☐ Alien Registration number | ☐ DOD ID number |
| ☐ Professional License number | ☐ Taxpayer Identification number | ☐ Business Taxpayer Identification number (sole proprietor) |
| ☐ Credit/Debit Card number | ☐ Business Credit Card number (sole proprietor) | ☐ Vehicle Identification number |
| ☐ Business Vehicle Identification number (sole proprietor) | ☐ Personal Bank Account number | ☐ Business Bank Account number (sole proprietor) |
| ☐ Personal Device Identifiers or Serial numbers | ☐ Business Device Identifiers or Serial numbers (sole proprietor) | ☐ Personal Mobile number |

☐ Health Plan Beneficiary number☐ Business Mobile number (sole proprietor)☐ DOD Benefits number**Biographical Information**☒ Name (Including Nicknames)☒ Business Mailing Address (sole proprietor)☐ Date of Birth (MM/DD/YY)☐ Ethnicity☒ Business Phone or Fax Number (sole proprietor)☐ Country of Birth☐ City or County of Birth☐ Group Organization/Membership☐ Religion/Religious Preference☐ Citizenship☐ Immigration Status☐ Home Phone or Fax Number☐ Home Address☐ ZIP Code☐ Marital Status☐ Spouse Information☐ Children Information☐ Military Service Information☐ Race☐ Nationality☐ Mother's Maiden Name☐ Personal Email Address☒ Business Email Address☐ Global Positioning System (GPS)/Location Data☐ Employment Information☐ Alias (Username/Scrennname)☐ Personal Financial Information (Including loan information)☐ Education Information☐ Resume or Curriculum Vitae☒ Business Financial Information (Including loan information)☐ Professional/Personal References**Biometrics**☐ Fingerprints☐ Hair Color☐ DNA Sample or Profile☐ Retina/Iris Scans☐ Video Recording

Distinguishing Features

- | | | |
|---|------------------------------------|-------------------------------------|
| ☐ Palm Prints | ☐ Eye Color | ☐ Signatures |
| ☐ Dental Profile | ☐ Photos | |

Characteristics

- | | | |
|--|--|---------------------------------|
| ☐ Vascular Scans | ☐ Height | ☐ Weight |
| ☐ Scars, Marks, Tattoos | ☐ Voice/Audio Recording | |

Device Information

- | | | |
|--|---|---|
| ☐ Device Settings or Preferences (e.g., Security Level, Sharing Options, Ringtones) | ☐ Cell Tower Records (e.g., Logs, User Location, Time) | ☐ Network Communication Data |
|--|---|---|

Medical /Emergency Information

- | | | |
|--|--|--|
| ☐ Medical/Health Information | ☐ Mental Health Information | ☐ Disability Information |
| ☐ Workers' Compensation Information | ☐ Patient ID Number | ☐ Emergency Contact Information |

Specific Information/File Types

- | | | |
|---|---|---|
| ☐ Personnel Files | ☐ Law Enforcement Information | ☐ Credit History Information |
| ☐ Health Information | ☐ Academic/Professional Background Information | ☐ Civil/Criminal History Information/Police Record |
| ☐ Case Files | ☐ Security Clearance/Background Check | ☐ Taxpayer Information/Tax Return Information |

2.2. What are the sources of the information in the system/program?

The source of the information in the system is the direct collection of data from customers voluntarily requesting export certificates.

2.2.1. How is the information collected?

Customers submit their information directly through the ATLAS web interface, using a username and password to log in.

2.3. Does the project/program or system use information from commercial sources or publicly available data. If so, explain why this is used?

The ATLAS system does not use commercial or publicly available data.

2.4. How will the information be checked for accuracy? How often will it be checked?

It is checked by a Dairy employee when the customer requests an account in ATLAS. Additionally, the PII is checked against the record in FMFI to ensure that it is accurate.

2.5. Does the system/program use third-party websites?

No

2.5.1. What is the purpose of the use of third-party websites?

Not Applicable. ATLAS does not use 3rd party websites.

2.5.1.1. What PII will be made available to the agency through the use of third-party websites?

Not Applicable. ATLAS does not use 3rd party websites.

2.6. **Privacy Impact Analysis:** Related to characterization of the information.

Follow the format below:

Privacy Risk: There is a risk that more information will be collected than necessary and that it will be inaccurate.

Mitigation: The system fields are limited to only the information needed to facilitate the issuance of various types of trade documentation and certificates between businesses and the government involving the trade and management of agricultural and plant products. The PII in the system is cross-referenced with the FMFI system to ensure data accuracy.

Section 3: Uses of the Information

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

- 3.1. Describe why and how the information collected, used, disseminated and/or maintained will support the program's business purpose?

ATLAS collects the business information of individuals who are submitting applications and receiving certificates and documentation on behalf of their organizations, including their names, business addresses, business email addresses, business telephone numbers and business fax numbers in order to facilitate the application process, to communicate with them about any questions and to issue the certificates to them.

- 3.2. Does the system/project/program use technology to conduct electronic searches, queries, or analysis in an electronic database to discover or locate a predictive pattern or anomaly? If so, state how USDA plans to use such results.

No. The ATLAS system does not use technology to conduct electronic searches, queries, or analysis to discover or locate predictive patterns or anomalies.

- 3.3. **Privacy Impact Analysis:** Related to uses of the information.

Follow the format below:

Privacy Risk: There is a risk that information will be used outside of the purposes of facilitating the issuance of various types of trade documentation and certificates between businesses and the government involving the trade and management of agricultural and plant products.

Mitigation: Access to the system requires supervisor approval. User roles limit access for each individual to records that are relevant to their job responsibilities and only to the customers within their office's purview. All users take annual USDA information security awareness training, which includes the importance of not using information for purposes outside of the original scope of collection.

Section 4: Notice

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

4.1. How does the project/program/system provide notice to individuals prior to collection?

The ATLAS website contains information about the purpose and use of the system. This PIA also serves as public notice of how information is processed in ATLAS. A Privacy Act Statement is not required as the information in ATLAS is not retrieved by a unique personal identifier.

4.2. What options are available for individuals to consent, decline, or opt out of the project?

Individuals can choose not to provide their information, but they will not be able to complete the application process or access the services provided by ATLAS.

4.3. **Privacy Impact Analysis:** Related to notice.

Follow the format below:

Privacy Risk: There is a risk that individuals may not be adequately informed about the collection and use of their information during the application process.

Mitigation: The ATLAS website contains information about the purpose and use of the system. This PIA also serves as notice to the public about the types of information collected in ATLAS and how the USDA uses it.

Section 5: Data Retention

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

5.1. What information is retained and for how long?

The official export certificates and billing records are retained for seven years.

5.2. Has the retention schedule been approved by the USDA records office and the National Archives and Records Administration (NARA)? If so, please indicate the name of the records retention schedule.

Yes. NCI – 136 -85 - 1.

5.3. **Privacy Impact Analysis:** Related to retention of information.

Follow the format below:

Privacy Risk: There is a risk that information will be retained longer than necessary.

Mitigation: The seven-year retention period balances the need to reference historical trade documents and certificates for a reasonable period, with the need to protect the information of the individuals submitting the applications. The data is disposed of in accordance with the record retention schedule.

Section 6: Information Sharing

The following questions are intended to define the content, scope, and authority for information sharing.

- 6.1. With which internal organizations and/or systems is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

Billing Information is transferred to the USDA's Financial Management Modernization Initiative (FMMI) to facilitate billing for services rendered via direct systems integration. The only PII transmitted is the customer business account number.

- 6.2. **Privacy Impact Analysis:** Related to internal sharing and disclosure.

Follow the format below:

Privacy Risk: There is a risk that information will be compromised while in transit to FMMI.

Mitigation: The integration between ATLAS and FMMI is encrypted, which ensures that it will remain unreadable if intercepted by unauthorized users.

- 6.3. With which external organizations (outside USDA) is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

The data from the export certificates, including the name and business address of the exporters, will be shared with the European Union's regulatory authority's electronic system via a direct system integration so that the EU can review and approve the certificates. Additionally, the certificates are occasionally shared with importers, when requested by the submitter, in order to expedite the export process. In these cases, the certificates are mailed to the importer via physical certified mail.

- 6.4. **Privacy Impact Analysis:** Related to external sharing and disclosure.

Follow the format below:

Privacy Risk: There is a risk of the information transmitted to the EU being compromised. There is also a risk of the certificates being mailed to the incorrect address.

Mitigation: The integration between ATLAS and the EU system will be encrypted to make sure the data can't be read or altered during the transmission. It will also use a digital signature and timestamp for verification and validation of the transmission. Additionally, an Interconnection Security Agreement (ISA) with the EU will be implemented, to specify security requirements. When a submitter requests that their certificates be mailed directly to the importers, the submitter must provide the shipping label for the USDA to use. Only certified mailing services with tracking numbers are used.

Section 7: Redress

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

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

Individuals can access their information directly in the system. They can also reach out to the regional and field office through which they requested services. Additionally, individuals may submit a Freedom of Information Act (FOIA) request via email (AMS.FOIA@usda.gov) or mail (to: FOIA Officer, 1400 Independence Avenue, SW Room 2055-S, Stop 0201 Washington, DC 20250-0201) or phone (202)-302-0650.

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

Individuals can update and resubmit the data directly within the system.

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

Individuals are notified of the procedures for correcting their information through the Salesforce Customer Portal, which includes guidance on how to submit correction requests.

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

Formal redress is provided, as noted above.

7.5. **Privacy Impact Analysis:** Related to redress.

Follow the format below:

Privacy Risk: There is a risk that individuals or businesses may not have a clear process to access or correct inaccurate information in the system.

Mitigation: ATLAS provides a process for businesses to access and correct their information through Salesforce Customer Portal. Authorized representatives can also contact USDA support staff to update or correct their information. Additionally, USDA ensures that all requests are verified and processed in a timely manner to maintain data accuracy.

Section 8: Auditing and Accountability

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

8.1. How is the information in the system/project/program secured?

The information in the ATLAS system is secured through multiple layers of protection. Access to the system is restricted to authorized users via USDA e-Authentication, which enforces multi-factor authentication, requiring a password and an additional form of authentication. Data is encrypted both in transit and at rest using industry-standard encryption protocols, which makes it unreadable to unauthorized users. The Salesforce platform is FedRAMP-certified and maintained by the USDA Office of the Chief Information Officer (OCIO) Digital Service Center, which conducts regular security audits and monitoring to ensure compliance with federal security standards. Additionally, role-based access controls are implemented to ensure that users can only access information necessary for their job responsibilities. Logging and monitoring are in place to detect and respond to unauthorized access attempts.

8.2. What procedures are in place to determine which users may access the program or system/project, and are they documented?

Access to the ATLAS system is determined based on user roles and responsibilities. Users must submit an access request, which is reviewed and approved by the system owner or designated authority. Access is granted through USDA e-Authentication, which enforces multi-factor authentication. Role-based access controls ensure that users can only access the information necessary for their job functions. These procedures are documented in the ATLAS System Security Plan and are reviewed periodically to ensure compliance with USDA policies and federal regulations.

8.3. How does the program review and approve information sharing requirements?

If an information sharing request were to be received, it would be reviewed by the system data officer and submitted to the Dairy Program Deputy Administrator for final review and approval.

8.4. Describe what privacy training is provided to users either generally or specifically relevant to the program or system/project?

All ATLAS users, including USDA personnel and contractors, are required to complete USDA Information Security Awareness Training annually. This training includes modules on privacy protection, proper handling of sensitive information, recognizing potential security threats, and understanding the responsibilities associated with accessing and managing data in the ATLAS system. Additional role-specific training is provided to users with elevated access privileges to ensure compliance with USDA privacy and security policies. This training is provided by the Dairy Program.

Privacy Impact Assessment Review

[USDA Privacy Office completes this section.]

Date reviewed by USDA Privacy Office: [Select a date.](#)

USDA Privacy Analyst (On behalf of USDA's Chief Privacy Officer):

Signed: _____

Signature of Responsible Officials

The individuals below attest that the information they provided in this Privacy Impact Assessment is true and accurate.

Signed: _____

Ashok Anant
APHIS Salesforce: ATLAS Information System Owner
AMS
U.S. Department of Agriculture

Signed: _____

Angela Cole
MRP Privacy Officer
U.S. Department of Agriculture

Signed: _____

Tracy Hendrix
Office of the Chief Privacy Officer
U.S. Department of Agriculture