



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.”

Table of Contents

Privacy Impact Assessment for the USDA IT System/Project.....	3
Mission Area System/Program Contacts	3
Abstract	4
Overview.....	4
Section 1: Authorities and Other Requirements	5
Section 2: Characterization of the Information	6
Section 3: Uses of the Information	11
Section 4: Notice	12
Section 5: Data Retention	13
Section 6: Information Sharing.....	14
Section 7: Redress	15
Section 8: Auditing and Accountability.....	17
Privacy Impact Assessment Review.....	19
Signature of Responsible Officials	19

Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	Veterinary Services Laboratory Submissions (VSLS)
Program Office	Veterinary Services (VS)
Mission Area	MRP
CSAM Number	1968
Date Submitted for Review	

Mission Area System/Program Contacts

Role	Name	Email	Phone Number
MA Privacy Officer	Angela Cole	Angela.cole@usda.gov	202-465-6265
Information System Security Manager	Josh Luterman	Joshua.luterman@usda.gov	970-494-7126
System/Program Managers	Orlando (Rich) Baca	orlando.r.baca@usda.gov	970-494-7346

Abstract

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

Veterinary Services Laboratory Submission (VSLS) is an enterprise-level information management system that provides a comprehensive, integrated approach to collecting and managing animal health data. VSLS is used by Veterinary Services (VS) and state animal health partners in animal disease management and surveillance programs to test and report animal diseases. The system collects the personal information for individuals who are the primary contact for premises that are the subject of animal disease activities or owners of animals being tested (name, email address, address, phone number and premises identification number) as well as the PII of state animal health officials who work with the USDA on animal disease surveillance and mitigation efforts (name, address, phone number and 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.

VSLS is owned by USDA APHIS Veterinary Services and supports the staging of lab submission data for surveillance program systems such as Surveillance Collaboration Services (SCS). It includes modules for Chronic Wasting Disease (CWD), Bovine Spongiform Encephalopathy (BSE), Scrapie and Wildlife Services Avian Influenza (AI). Additionally, it hosts a module for the California Avian Health Group.

VSLS is a “Major Application” with a FIPS-199 classification of “Moderate”. VSLS contains the contact information of the owners of premises or animals that are the subject of animal diseases, which the USDA uses to contact them about animal disease events and test results. VSLS also collects the contact information of the state animal health officials who use the system for animal disease management for the USDA to communicate with them about projects and to furnish them with VSLS accounts. The information in VSLS is authorized to be collected under the Animal Health Protection Act, the Farm Security and Rural Investment Act, the Public Health, Security and Bioterrorism Preparedness and Response Act and the Code of Federal Regulations Title 9, parts 54 and 79. VSLS contains the PII of roughly 1,000 individuals.

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 Animal Health Protection Act (7 U. S. C. 8301-8317)
- The Farm Security and Rural Investment Act of 2002
- Public Health, Security and Bioterrorism Preparedness and Response Act of 2002 (116 Stat 674-678)
- Code of Federal Regulations Title 9, parts 54 and 79 for scrapie

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

Yes:

- The Security Plan – Updated and signed: 9/12/2023
- The Authorization Status – Renewed as of 10/2/2023 until 10/2/2026
- The Risk Review Completion Date – 8/22/2024
- The FIPS 199 classification of the system - MODERATE

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

[Animal Health, Disease, and Pest Surveillance and Management System, USDA/APHIS–15](#)

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

Yes, the VS Specimen Submission Form (VS Form 10-4. OMB #s 579-0040, 579-0090, 0579-0101, 0579-0146, 0579-0189, 0579-0485) is used to collect information.

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/Screename)☐ 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 |

Premises ID is captured

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

The personal information (names, business email addresses, business address, and business phone numbers) is collected directly from the individuals who own the animals or own or operate the clinics, exhibitions, laboratories or market/concentration points where animal samples are tested. The premises ID is a unique identifier for each location being tested and is assigned by the VSLS system.

State employees working on animal disease surveillance activities provide their own PII (names, addresses, phone numbers and email addresses).

2.2.1. How is the information collected?

The PII of the premises and animal owners is collected and entered directly into the application by federal employees and cooperating state employees. The federal or state employees gather this information using a variety of methods:

- In-person: State or federal employees will collect data while visiting the premises. The data can be entered directly into VSLS while on site, or it can be written on paper by the employee and transferred to VSLS when they return to their office.
- Mail: Premises contacts may submit data to state or federal employees on paper forms and mail to the appropriate office. Upon receipt, state or federal employees will validate the submitted data and, if considered accurate, will transfer to VSLS.
- Email: Premises contacts may submit data to state or federal employees on electronic forms and email to the appropriate email address. Upon receipt of the email, State or Federal employees will validate the submitted data and, if considered accurate, will transfer to VSLS.

State workers submit their own information via the USDA User Management System to be furnished with an account in VSLS and assigned a role in the system.

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

No

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

Data collected from customers is verified for accuracy, relevance, timeliness, and completeness by USDA and state employees at the time the data is collected. These employees are responsible for the review and accuracy of the data. Checking data for accuracy is part of employee training, depending on the mission area of the program. Persons' address information only provides value during the lifecycle of the laboratory testing process and is not used or validated beyond the time of collection. Also, there are limited systematic data entry constraints to ensure entry completeness and that data is entered into the correct field. Examples include date fields only allowing dates and menus using drop downs as opposed to free text when possible. This reduces the likelihood of data being entered into the incorrect field.

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?

N/A

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

N/A

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

Follow the format below:

Privacy Risk: The collection of unneeded or extraneous PII, as well as inaccurate information, is a risk with the characterization of information.

Mitigation: PII is only collected and used for the intended purpose of the system and as outlined in the System of Record Notice (SORN). Additionally, information collected is minimized to only that which is required for testing and monitoring animal health. The PII is collected directly from individuals and is checked for accuracy, which is part of training that users receive.

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?

The data in VSLS is used for routine animal health surveillance, management of domestic animal disease and pest control programs, and to monitor for and respond to the introduction of foreign animal diseases.

The PII specifically (names, addresses, email addresses and phone numbers of the premises/animal owners) is used to be able to understand the locations of animal disease events to help with mitigation efforts. It is also used to contact the owners of premises about activities on their properties and the owners of animals about their animal health statuses and animal test results.

The PII of the state animal health officials (names, addresses, phone numbers and email addresses) is used to communicate with them about animal disease work and to be able to furnish them with accounts and to assign them user roles in VSLS.

- 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

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

Follow the format below:

Privacy Risk: There is a risk that PII will be used outside of its intended purposes.

Mitigation: VSLS adheres to the APHIS-15 SORN, which lays out the PII being collected as well how it is used. Only users who are authenticated and designated as active are permitted access to VSLS. Access privileges are determined by role-based or feature-based access controls, which specify what actions users can perform within the system and what information they have access to. These access rights are assigned based on the specific responsibilities of each individual to ensure that they only have access to functionality and information needed for them to carry out their work. To obtain a VSLS account, users must utilize their e-Authentication credentials and receive supervisor approval.

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 APHIS-15 SORN and this PIA serve as public notice to individuals about the types of information collected in VSLS, the purpose of the collection, and how the information is used. A Privacy Act Statement is currently being developed for the form that collects PII from the animal owners and points of contact for locations being tested.

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

To participate in the program, individuals must provide their information, as it is required for the USDA to carry out its work. If individuals choose not to provide their information, animal health services will not be provided. Also, individuals involved in animal disease investigations are required to provide information governed by specific animal health laws and regulations of the state in which they reside.

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

Follow the format below:

Privacy Risk: There is the risk of the lack of transparency with individuals regarding the collection and use of their PII as there is currently not a Privacy Act Statement in place.

Mitigation: VSLS adheres to the APHIS-15 SORN which lays out the PII being collected as well how it is used and is posted publicly online. This PIA serves also serves as notice. A Privacy Act Statement is currently being developed for the Specimen Submission Form as well, in order to provide notice at the time of collection.

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?

Some content in this system is currently unscheduled. This content is in the process of being scheduled due to changes in record-keeping practices.

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.

No. VS is currently performing a review and analysis of the records within VSLS for categorization and subsequent submission to NARA.

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

Follow the format below:

Privacy Risk: There are risks related to long term retention of unneeded or outdated PII, both from a minimization and security standpoint as the longer information is retained, the less likely it is to be needed and the more likely it is to be compromised.

Mitigation: VSLS maintains information in a secure manner, including information that is being retained for retention purposes. All information in the system is encrypted, which scrambles it and makes it unreadable to unauthorized users. Role-based controls are in place to ensure that users only have access to information that they need for their job responsibilities. Audit logging is also in place, so system administrators can see any changes made in the system if needed. Once the NARA schedule is approved, VSLS will dispose of information per APHIS Directive 3440.2 and approval from the NARA disposition authority

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?

PII is not shared internally.

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

Follow the format below:

Privacy Risk: N/A PII is not shared internally.

Mitigation: N/A PII is not shared internally.

- 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?

PII is generally not shared externally outside of the USDA, beyond the state users who are helping the USDA in disease surveillance and mitigation efforts. These individuals access the same information as USDA employees through direct access to the system. Additionally, there may be exceptional cases of external sharing, such as in a data breach or legal case, and these are outlined in the SORN.

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

Follow the format below:

Privacy Risk: There is the risk of unauthorized access to information for external state animal health officials.

Mitigation: All external users must request access through the USDA User Management System (UMS), and demonstrate a business need to access the system. A USDA supervisor must review the request and approve it before a system owner provides access. Roles are assigned in the system to state animal health officials that limit their access to information to only what they require for their official duties. For example, a state animal health official can only view information related to their particular state. User access and activity are logged in the system and can be reviewed by the system administrator if needed. All users are trained in information security before accessing the system, including in the importance of maintaining the confidentiality of information.

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?

Any individual may obtain information from a record in the system that pertains to him or her by submitting a Privacy Act or Freedom of Information Act (FOIA) request. Individuals are notified of the procedure to gain access to their information in the Record Access Procedures section as outlined in the SORN ADTIS-16. Requests for copies of records should be in writing, and the request must contain the requesting individual's name, address, name of the system of records, timeframe for the records in question, any other pertinent information to help identify the file, and a copy of his/her photo identification containing a current address for verification of identification. These requests can be submitted through the APHIS Privacy Act/FOIA Portal, via email (APHISPrivacy@usda.gov) or physical mail (to: Freedom of Information and Privacy Act Staff, Legislative and Public Affairs, APHIS, 5601 Sunnyside Avenue Beltsville, MD 20705).

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

Individuals can submit a request to the APHIS Privacy Act Officer to request correction by using the contact information listed above in question 7.1. Customers can also contact the APHIS or State office where they first provided the information and request correction of inaccurate or erroneous information.

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

Individuals are notified via this PIA as well as the System of Record Notice (SORN). Additionally, APHIS posts the instructions on how to submit FOIA and Privacy Act requests publicly on its website.

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

N/A. There is a formal redress process in place.

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

Follow the format below:

Privacy Risk: There is a risk that individuals will not be aware of how to update or correct their PII.

Mitigation: Individuals are notified of the procedures to correct their information in SORN and this PIA, as well as during routine renewal-type notices and any new emergency response efforts that affect a premises owner. Additionally, APHIS publicly posts instructions on how to submit FOIA and Privacy Act requests on its website, as listed above.

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 VSLS is continuously monitored to ensure that changes to the data are logged and reviewed. Auditing is performed to also alert the database administrators to privileged action taken against the database objects. The logs are correlated and saved at an Enterprise level to aid forensic investigation if the need arises.

Access controls are in place to ensure that only users with approval can access the data, and the concept of least privileged is enforced to ensure only the minimum access and privileges are granted to enable users to perform their job function. User access is audited on a continual basis via the UMS system.

VSLS employs encryption to protect data during transmission by making it unreadable to unauthorized users and enforces multifactor authentication for user access to ensure that users must use a password plus an additional form of authentication. Password controls, procedures, responsibilities, and policies follow USDA departmental standards. APHIS employees must use LincPass to access their computer and the APHIS network, including the Virtual Privacy Network (VPN). There is no action that can be performed within the VSLS without identification and authentication.

At the USDA and APHIS Enterprise level, intrusion detection and intrusion prevention, firewalls and antivirus measures are employed on a continuous basis to identify and prevent external attacks.

All security controls are regularly tested to ensure they are implemented as stated and ensure their effectiveness.

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

Only users who are authenticated and designated as active are permitted access to VSLS. Access privileges are determined by role-based or feature-based access controls, which specify what actions users can perform within the system and what information they have access to. These access rights are assigned based on the specific responsibilities of each individual to ensure that they only have access to functionality and information needed for them to carry out their work. To obtain a VSLS account, users must utilize their e-Authentication credentials and receive supervisor approval. Criteria, procedures, and controls for access to the system are documented.

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

The VSLS Information System Security Officer and System Owner review and approve any information sharing requests.

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

All APHIS employees provided with access to the VSLS application are required to complete annual Information Technology (IT) Security Awareness Training and must sign the APHIS Rules of Behavior form prior to receiving access to the information system. This general training allows organizational users with access to personally identifiable information to receive privacy-related training.

Privacy Impact Assessment Review

[USDA Privacy Office completes this section.]

Date reviewed by USDA Privacy Office: 4/1/2026

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.

ORLANDO BACA Digitally signed by ORLANDO
BACA
Date: 2026.05.05 08:35:55 -06'00'
Signed: _____

Orlando Baca
System Owner
APHIS
U.S. Department of Agriculture

ANGELA COLE Digitally signed by ANGELA
COLE
Date: 2026.05.07 16:06:40
-04'00'
Signed: _____

Angela Cole
Assistant Chief Information Security Officer (ACISO)/Chief Privacy Officer (CPO)
MRP
U.S. Department of Agriculture

**TRACY
HENDRIX** Digitally signed by
TRACY HENDRIX
Date: 2026.05.01
15:56:48 -04'00'
Signed: _____

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