

WS Directive

4.130 08/29/11

INFORMATION AND DATA MANAGEMENT AND SECURITY

1. PURPOSE

To provide guidelines to Wildlife Services (WS) personnel for effective and proper handling and security of program information and data.

2. REPLACEMENT HIGHLIGHTS

This directive revises WS Directive 4.130 dated 08/09/04.

3. DEFINITIONS

- a. Data. Discrete facts, statistics, or items of information. Values or sets of values representing a specific concept or concepts. Data becomes “information” when analyzed and possibly combined with other data in order to extract meaning, and to provide context. The meaning of data can vary according to its context.
- b. Information. The communication or reception of knowledge; something received or obtained by communicating with others or through study or instruction.
- c. Requestor. As related to information and data management, anyone who asks for information from the WS program.
- d. System of Records. A group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual. In WS the system of records is known as the Management Information System (MIS or MIS2000). It includes all data entered into the MIS electronic database and all hard copy documents associated with the data

4. BACKGROUND

The WS system of records was developed in compliance with Federal acts and guidance provided by oversight agencies and entities. Consult the WS Information and Data Management Handbook (IDMH) for a list of authorities and guidance sources. A brief summary of selected Acts and guidance is provided below for clarification.

- a. The Freedom of Information Act (FOIA) is a disclosure statute designed to allow the public access to documents held by administrative agencies of the Executive Branch of the Federal Government. The intent of the FOIA is to provide, in a timely manner, access to Federal records that already exist, not to create records or to respond to

questions through dialogue. Requesters may ask for any agency record. The Animal and Plant Health Inspection Service (APHIS) FOIA Officer makes the determination about what information should be withheld based on nine exemptions specified in the Act. Information may not be withheld unless it specifically falls under one of the nine exemptions. Refer to APHIS Directive 156.1, Freedom of Information Act/Privacy Act Guidelines, for a list of exemptions. The APHIS FOIA Officer is the deciding official on information that may be withheld under the FOIA.

- b. The Privacy Act provides requirements for collecting, maintaining, and disclosing personal information obtained by Government offices from or about individuals and contained in a system of records.

Personal information obtained by Government offices from or about individuals is protected from disclosure by the Privacy Act. The following are often used for the express purpose of distinguishing individual identity, and is Personally Identifiable Information (PII) under the definition used by the U.S. Office of Management and Budget and published by the National Institute of Standards and Technology (NIST):

- Full name (if not common)
- National identification number
- IP address (in some cases)
- Vehicle registration plate number
- Driver's license number
- Face, fingerprints, or handwriting
- Credit card numbers
- Digital identity
- Birthday
- Birthplace
- Genetic information

The following are less often used to distinguish individual identity, because they are traits shared by many people. However, they are potentially PII, because they may be combined with other personal information to identify an individual.

- First or last name, if common
- Country, state, or city of residence
- Age, especially if non-specific
- Gender or race
- Name of workplace or the school individual attends
- Grades, salary, or job position
- Criminal record

- c. The Federal Information Processing Standards (FIPS) Publication 199, of the NIST is the official series of publications relating to standards and guidelines adopted and promulgated under the provisions of Section 5131 of the Information Technology Management Reform Act of 1996 (Public Law 104-106) and the Federal Information Security Management Act of 2002 (Public Law 107-347). These mandates have given the Secretary of Commerce and NIST important responsibilities for improving the utilization and management of computer and related telecommunications systems in

the Federal Government. The NIST, through its Information Technology Laboratory, provides leadership, technical guidance, and coordination of government efforts in the development of standards and guidelines in these areas. WS has categorized its information system (MIS) and its information in accordance with these guidelines. Refer to the IDMH for details.

- d. The WS System of Records includes a database and other information collected and maintained about WS' program activities. This system of records includes minimal information about WS customers for the purpose of conducting business; complying with Federal record keeping mandates; and evaluating program performance, including goal accomplishments. The MIS System of Records contains both electronic and hard copy records. The terms "MIS", "MIS2000", and "System of Records" may be used interchangeably in this directive and in companion documents referenced.

WS collects information about organizations, industry, Federal and non-Federal entities, and members of the public as part of cooperative direct control or technical assistance activities throughout the United States and its territories. Cooperator information is provided voluntarily by those who wish to obtain assistance from WS. This information is collected by a WS employee from the person seeking services, or from an authorized representative, employee, owner, manager, or executor of that person. In such cases where the cooperator is a Government agency or a private organization, such information is collected from an official representative of the cooperating entity.

Completion of a Work Initiation Document (WID), one of the WS Form 12 Series, is required prior to WS beginning work on a property. A copy of this document must be maintained in the WS State Office.

Some wildlife damage management activities will not require processing a WID if supporting documents include the same information that is required in the WID such as those implemented using agreements or work plans with federal, state, or local governing bodies.

The life cycle of the WID is five years. The WS IDMH provides additional information about the initiation, completion and renewal of the WID.

5. POLICY

WS employees shall manage all information, data, and its security in accordance with current APHIS directives, policies, and guidelines (see Section 6a2). Notwithstanding, this directive gives more specific guidance for conduct of activities unique to WS information and data management systems and processes.

This Directive establishes policy and procedure for collection and retention of data, exchange of information among WS employees and with other Government agencies, transfer of information to the public, and securing such data and information maintained by WS.

6. PROCEDURES

a. WS System of Records Management.

1. Duties, roles, and responsibilities for information actions and data management of the WS system of records are outlined in the WS IDMH. Specific guidance on subjects related to the system of records shall be sought in accordance with the protocol set forth in the WS IDMH.
2. Data entry, access, use, security, integrity guaranty, retention and disposal in MIS are managed in accordance with standards established by APHIS (MRP Directives 3040.2, and 3040.3, and APHIS Directives 156.1, 1510.1, 3031.1, 3140.3, 3140.5) and APHIS Records Management policy and guidelines. Related information is further set forth and clarified in the WS IDMH. New or revised procedures that may be contemplated as WS information and data management processes evolve shall be referred to the Director, Operational Support Staff, 4700 River Road, Unit 87, Riverdale MD, 20737-1234, Phone: 301/734-7921 for evaluation and approval.

b. Information Transfer and the WS System of Records.

Consult Section 9.0 of the WS IDMH for guidance on process and the nature of restricted- and unrestricted-circulation information based on Privacy Act mandates, FOIA, and routine WS information transfer procedures. In addition, any media interviews contemplated should be discussed with Legislative and Public Affairs if controversial issues might arise, or there is uncertainty about the subject material.

7. REFERENCES

- [APHIS \(Animal and Plant Health Inspection Service\). 2010. Records Management.](#)
[. 2009. APHIS Directive 3140.5. APHIS information systems security \(iss\) roles and responsibilities.](#)
[. 2004. APHIS Directive 3031.1. Clearance of public reporting and recordkeeping.](#)
[. 2000. APHIS Directive 3140.3. APHIS internet use and security policy.](#)
[. 1996. APHIS Directive 1510.1. Communications with offices of members of congress, OMB, and OBPA.](#)
[. 1982. APHIS Directive 156.1. Freedom of Information act/privacy act guidelines, and enclosures as amended in 10/4/83.](#)
Information Technology Management Reform Act of 1996 (Public Law 104-106).
Section 5131
Federal Information Security Management Act of 2002 (Public Law 107-347).
[MRP \(Marketing and Regulatory Programs\). 1998. Directive 3040.2. MRP Records Management Program.](#)
[MRP \(Marketing and Regulatory Programs\). 1998. Directive 3040.3. Electronic records management program.](#)

[NIST \(National Institute of Standards and Technology\). Federal Information Processing Standards \(FIPS\) Publication 199.](#)

[NIST \(National Institute of Standards and Technology\). Guide to Protecting the Confidentiality of Personally Identifiable Information. Special Publication 800-122.](#)

[The Freedom of Information Act, 7 U.S.C. § 370.](#)

[The Privacy Act of 1974, 5 U.S.C. § 552 a, as amended.](#)

[Wildlife Services \(WS\). 2011. WS Information and Data Management Handbook, Revision Three. WS Operational Support Staff. 25 pp.](#)

A handwritten signature in black ink that reads "William H. Clay". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Deputy Administrator