



# **Privacy Impact Assessment**

**License and Registration Information System  
(LARIS)**

***Revision: 1.0***

**Animal and Plant Health Inspection Service (APHIS)**

***Date: December 14, 2007***

Sensitive But Unclassified/Sensitive Security Information – Disseminate on a Need-To-Know Basis Only

Template Release 070606

## USDA PRIVACY IMPACT ASSESSMENT FORM

**Agency:** Animal and Plant Health Inspection (APHIS), Animal Care (AC)

**System Name:** License and Registration Information System (LARIS)

**System Type:**

- Major Application
- General Support System
- Non-major Application

**System Categorization (per FIPS 199):**

- High
- Moderate
- Low

### Description of the System:

LARIS allows Animal Care (AC) field inspectors to have direct access to a current copy of the Oracle database and have immediate availability on the current status of any Animal Welfare regulated facility in the United States. The system allows AC to shift its end base away from the regional offices to the various field Inspectors who perform the inspection function. LARIS7 (the current operational version) provides AC with the capability to enter and retrieve licensing and registration data from approximately 100 field agent locations throughout the United States. In meeting AC strategic objectives, the current system enhancements will meet the E-Gov requirements and other program mandates to revise the inspection form so it is automated and customer-oriented.

### 8.0 System Environment

The LARIS system is a customized Oracle application which resides on an APHIS application server located in Riverdale, MD. The system operates in a global Information Technology (IT) architecture that supports applications and employees worldwide. Key components of this architecture include:

- Desktop systems – Dell Personal computer workstations and laptop computers running Windows 2000 or XP Professional.
- Application Servers -APHIS AIX Servers are located inside government-owned buildings, occupied by APHIS personnel, and are not normally open to the general public. There are approximately 52 servers configured with the AIX operating system. The systems are connected to the Internet via USDA approved Internet gateways, and may be accessible via dial-up lines for properly authorized remote users. In- and outbound Internet connections are secured by USDA provided and maintained firewalls. The LARIS application resides on one of the MDRDS50.APHIS.USDA.GOV (IBM Server) located in the Riverdale, MD facility.

**Who owns this system?**

Dr. Chester Gipson  
Deputy Administrator  
Animal Care  
(202) 720-3580

**Who is the security contact for this system?**

Thay Ly  
Director of Information Technology  
Animal Care  
(301) 734-5189  
Thay.ly@aphis.usda.gov

**Who completed this document?**

COACT, Inc.  
9140 Guilford Rd. Suite N  
Columbia, MD 21046  
(301) 498-0150

**DOES THE SYSTEM CONTAIN INFORMATION ABOUT INDIVIDUALS IN AN IDENTIFIABLE FORM?**

Indicate whether the following types of personal data are present in the system

<b>QUESTION 1</b>	Citizens	Employees
Does the system contain any of the following type of data as it relates to individual:		
Name	<b>Yes</b>	<b>Yes</b>
Social Security Number	<b>Yes</b>	<b>Yes</b>
Telephone Number	<b>Yes</b>	<b>Yes</b>
Email address	<b>Yes</b>	<b>Yes</b>
Street address	<b>Yes</b>	<b>No</b>
Financial data	<b>No</b>	<b>No</b>
Health data	<b>No</b>	<b>No</b>
Biometric data	<b>No</b>	<b>No</b>
<b>QUESTION 2</b>	<b>Yes</b>	<b>Yes</b>
Can individuals be uniquely identified using personal information such as a combination of gender, race, birth date, geographic indicator, biometric data, etc.?		
NOTE: 87% of the US population can be uniquely identified with a combination of gender, birth date and five digit zip code <sup>1</sup>		
Are social security numbers embedded in any field?	<b>Yes</b>	<b>Yes</b>
Is any portion of a social security numbers used?	<b>Yes</b>	<b>Yes</b>
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	<b>No</b>	<b>No</b>



**If all of the answers in Questions 1 and 2 are NO,**

You do not need to complete a Privacy Impact Assessment for this system and the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

**3. No, because the system does not contain, process, or transmit personal identifying information.**

If any answer in Questions 1 and 2 is YES, provide complete answers to all questions below.

<sup>1</sup> Comments of Latanya Sweeney, Ph.D., Director, Laboratory for International Data Privacy Assistant Professor of Computer Science and of Public Policy Carnegie Mellon University To the Department of Health and Human Services On "Standards of Privacy of Individually Identifiable Health Information". 26 April 2002.

## DATA COLLECTION

### 3. Generally describe the data to be used in the system.

*The database was designed to support the Animal Welfare Act (AWA) which is a program mandated by Congress. The AWA portion contains information on individuals with certificates and others that have stated an interest or applied for a certification under the AWA. AWA inspection reports are generated by the database with entry by field personnel during onsite inspections. .*

*The LARIS system requires input from and sends information back to all USDA personnel identified as users of the system. All users of the system will have their access to the data restricted based on their user role(s). These roles include (but are not limited to): Animal Care Inspectors (ACI), Veterinary Medical Officers (VMO), Supervisory Animal Care Specialists (SACS), Regional Animal Care Specialists (RACS), , Assistant Regional Directors (ARD), Regional Directors, Program Specialist (PS), Computer Specialist (CS), Inspection and Licensing Assistants (ILA), and Headquarters AC personnel.*

*The current type of data that is collected, stored, and analyzed by LARIS is:*

- *Customer Data Entry*
  - *Inspection Data Entry*
  - *Research Facility Annual Report Data Entry*
  - *Complaint Data Entry*
1. *Customer Data Entry involves the entry of data for individuals and organizations that contact the USDA APHIS AC regional offices for information on the licensing or registration process and requirements. These customers are tracked for the purposes of verifying the date(s) on which information was sent to the individual or organization in cases of investigations and/or legal actions taken against these agencies. Customer Data Entry involves the entry of data as delineated on the most recent version of the 7003-A (License Application), 7003 (License Renewal), and 7011 (Registration Application and Renewal) forms. Once the customer information has submitted a valid application for license and/or registration they are converted to Certificate Holders.*
  2. *Inspection Data Entry involves the entry of data associated with the inspection report that is performed completed by the Field Inspector.*
  3. *Research Facility Annual Report Data Entry.*
  4. *Complaint Data Entry involves the entry of data associated with a given complaint against a USDA-licensed or -registered organization.*

4. Is the collection of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.

Yes  
 No

5. Sources of the data in the system.

- 5.1. What data is being collected from the customer?

*Name of business, owner's name, address, telephone numbers, social security number or federal tax identification number, locations of animals, and animals used in research is provided by the individual.*

- 5.2. What USDA agencies are providing data for use in the system?

*Animal and Plant Health Inspection Service (APHIS)*

- 5.3. What state and local agencies are providing data for use in the system?

*None*

- 5.4. From what other third party sources is data being collected?

*The LARIS application collects and stores the entry of data when an individual of the general public files a complaint against a USDA-licensed or -registered organization.*

6. Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e. NFC, RD, etc.) or Non-USDA sources.

Yes  
 No. If NO, go to question 7

- 6.1. How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?

*Data collected from individuals on application and renewal forms will be reviewed by Animal Care prior to being entered into the database. On routine field inspections for AWA a, spot check will be done to validate accuracy of records maintained in the database.*

- 6.2. How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?

*See Section 6.1*

- 6.3. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?

*See Section 6.1*

## DATA USE

7. Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?

*The system will be used to collect and manage customer data for license, registration, and facility research which are part of the animal care collection and have been reported to the Department for GPEA and e-Authentication purposes. It will be used by the Animal Care Regional offices and field inspectors to conduct the inspections.*

8. Will the data be used for any other purpose?

- Yes  
 No. If NO, go to question 9

- 8.1. What are the other purposes?

9. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President

- Yes  
 No

10. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e. aggregating farm loans by zip codes in which only one farm exists.)?

- Yes  
 No. If NO, go to question 11

- 10.1. Will the new data be placed in the individual's record (customer or employee)?

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- Yes  
 No

10.2. Can the system make determinations about customers or employees that would not be possible without the new data?

- Yes  
 No

10.3. How will the new data be verified for relevance and accuracy?

**11.** Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?

*See Section 7.0*

**12.** Will the data be used for any other uses (routine or otherwise)?

- Yes  
 No. If NO, go to question 13

12.1. What are the other uses?

*The States of Missouri and Kansas will have access to this database. These states will use individual data on facilities within their State to assist with enforcement of State and local animal welfare laws and animal facility licensing requirements. The states will have read only access limited to the data about facilities / inspections within their respective states.*

**13.** Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?

- Yes  
 No. If NO, go to question 14

13.1. What controls are in place to protect the data and prevent unauthorized access?

*The system is employing role based access control requiring the user to authenticate using a user id and password to gain access to the system.*



**14. Are processes being consolidated?**

- Yes  
 No. If NO, go to question 15

14.1. What controls are in place to protect the data and prevent unauthorized access?

## DATA RETENTION

**15. Is the data periodically purged from the system?**

- Yes  
 No. If NO, go to question 16

15.1. How long is the data retained whether it is on paper, electronically, in the system or in a backup?

15.2. What are the procedures for purging the data at the end of the retention period?

*AWA data will be archived after three years unless identified to be retained in the database. The regional offices and headquarters are responsible for monitoring proper record retention. Animal Care's procedures on record keeping will be used as a reference. Currently, all data is kept in the secured archive system in house and off site. The archiving of data is performed on a daily, weekly, and monthly schedule; and the procedures are documented as part of the APHIS computer room operational document.*

*Reports will be destroyed when the information contained therein is neither timely nor relevant. In most cases, reports are considered to be outdated after somewhere between several days and a few months, due to new information being entered in the database.*

15.3. Where are these procedures documented?

Please see the Statement of Records Notice for LARIS.

**16. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?**

*The fact that customers are required to renew their license and registration every one to three years will help ensure the data that is maintained is current and up-to-date. The system provides many different reporting mechanisms to validate the integrity of the data housed in the database, and to ensure data in it is current. The system*

*administrator requires all field inspectors synch their laptops with LARIS weekly to ensure that all information is kept up to date.*

17. Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?

Yes  
 No

## DATA SHARING

18. Will other agencies share data or have access to data in this system (i.e. international, federal, state, local, other, etc.)?

Yes  
 No. If NO, go to question 19

- 18.1. How will the data be used by the other agency?

*The States of Missouri and Kansas will have access to this database. These states will use individual data on facilities within their State to assist with enforcement of State and local animal welfare laws and animal facility licensing requirements.*

- 18.2. Who is responsible for assuring the other agency properly uses of the data?

*Missouri Department of Agriculture -- Animal Health Department  
Kansas Department of Agriculture -- Animal Health Department*

19. Is the data transmitted to another agency or an independent site?

Yes  
 No. If NO, go to question 20

*Those States with the memorandum of understanding with APHIS will have access to only finalized inspection reports for their respective States.*

- 19.1. Is there the appropriate agreement in place to document the interconnection and that the PII and/or Privacy Act data is appropriately protected?

*No*

20. Is the system operated in more than one site?

Yes  
 No. If NO, go to question 21

20.1. How will consistent use of the system and data be maintained in all sites?

*The system is used by the Regional staff and AC inspectors to enter and collect the data at the fields. Data is synchronized by the field inspectors with the central database weekly to update the server database repository and the update client database. All users will initially be trained and will receive periodic review training. Animal Care computer specialists along with program assistants will review daily the processes by which data is entered, retrieved, used, and synchronized. There is also a LARIS user's manual that will aid in maintaining consistency.*

## DATA ACCESS

21. Who will have access to the data in the system (i.e. users, managers, system administrators, developers, etc.)?

*Animal Control's IT staff and AC Headquarters and Regional staff include directors, assistant directors, supervisor animal care specialist, animal care inspector, veterinary medical officer, and State officials will have access to the data in the system.*

22. How will user access to the data be determined?

*Access to data is determined by user roles. The access controls are assigned with the appropriate level of authorities and documented.*

22.1. Are criteria, procedures, controls, and responsibilities regarding user access documented?

- Yes  
 No

23. How will user access to the data be restricted?

*Users will have access to the data based on the role assigned which restricts users to data that is permitted. Animal Care employees and other APHIS employees as delegated by Animal Care's Deputy Administrator will have access to all the data. Those States with the memorandum of understanding with APHIS will have access to only finalized inspection reports.*

23.1. Are procedures in place to detect or deter browsing or unauthorized user access?

- Yes  
 No

24. Does the system employ security controls to make information unusable to unauthorized individuals (i.e. encryption, strong authentication procedures, etc.)?

- Yes  
 No

## CUSTOMER PROTECTION

25. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e. office, person, departmental position, etc.)?

*Currently nobody is officially responsible for protecting the privacy rights of the customers and employees who the LARIS application is storing data on. It has been proposed in future upgrades to allow IES's system (Compliance Information Tracking System) to have read only access to this system. For now, the application enforces role based access to determine who has a need-to-know right to view data stored by the application.*

All users of the system will have their access to the data restricted based on their user role(s). These roles include (but are not limited to): Animal Care Inspectors (ACI), Veterinary Medical Officers (VMO), Supervisory Animal Care Specialists (SACS), Regional Animal Care Specialists (RACS), Assistant Regional Directors (ARD), Regional Directors, Program Specialist (PS), Computer Specialist (CS), Inspection and Licensing Assistants (ILA), and Headquarters AC personnel.

26. How can customers and employees contact the office or person responsible for protecting their privacy rights?

*Customers can contact the LARIS Security Officer:*

*Thay Ly  
Director of Information Technology  
Animal Care  
(301) 734-5189  
Thay.ly@aphis.usda.gov*

27. A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?

- Yes. If YES, go to question 28  
 No

27.1. If NO, please enter the POAM number with the estimated completion date:

**28.** Consider the following:

- Consolidation and linkage of files and systems
- Derivation of data
- Accelerated information processing and decision making
- Use of new technologies

Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?

- Yes  
 No. If NO, go to question 29

28.1. Explain how this will be mitigated?

**29.** How will the system and its use ensure equitable treatment of customers?

*All forms, reports, menus, screens, and presentations within the OACIS application will comply with:*

- *American with Disabilities Act and Rehabilitation Act (Section 508)*
- *Privacy Act*
- *USDA E-Government Strategic Plan – E-auth system*

**30.** Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?

- Yes  
 No. If NO, go to question 31

30.1. Explain

*LARIS is employing Role based access so the level of access to data will be different based on the perceived need of the “user”/customer/employee.*

## SYSTEM OF RECORD

**31.** Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?

- Yes  
 No. If NO, go to question 32

31.1. How will the data be retrieved? In other words, what is the identifying attribute (i.e. employee number, social security number, etc.)?

*The data base contains addresses, phone numbers, and other unique identifiers Social Security Number, Federal Tax ID number (TIN) that will allow Animal Care to identify and locate individuals. The only monitoring done will be the individual's compliance with the AWA.*

- 31.2. Under which Systems of Record notice (SOR) does the system operate? Provide number, name and publication date. (SORs can be viewed at [www.access.GPO.gov](http://www.access.GPO.gov))

*Privacy Act Online via GPO Access [wais.access.gpo.gov]  
[DOCID:agri\_000-22]*

- 31.3. If the system is being modified, will the SOR require amendment or revision?  
N/A

*If deemed a major change to the system per NIST 800-53, then yes.*

## TECHNOLOGY

32. Is the system using technologies in ways not previously employed by the agency (e.g. Caller-ID)?

Yes  
 No. If NO, the questionnaire is complete.

- 32.1. How does the use of this technology affect customer privacy?

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

**1. Yes.**

PLEASE SUBMIT A COPY TO  
THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE/CYBER SECURITY

## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the License and Registration Information System (LARIS).

This document has been completed in accordance with the requirements of the EGovernment Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

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System Manager/Owner  
OR Project Representative  
OR Program/Office Head.

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Date

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Agency's Chief FOIA officer  
OR Senior Official for Privacy  
OR Designated privacy person

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Date

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Agency OCIO

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Date