

USDA
Privacy Impact Assessment
for
Generic Disease Database (GDB)

September 2007

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the Generic Disease Database (GDB) System. This document has been completed in accordance with the requirements of the E-Government Act of 2002.

MANAGEMENT CERTIFICATION - Please check the appropriate statement.

The document is accepted.

The document is accepted pending the changes noted.

The document is not accepted.

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.



System Manager

9/12/07

DATE

OCIO/Project Representative

DATE

Program/Office Head

DATE

OCIO

DATE

Chief FOI/PA

DATE

Senior Official for Privacy

DATE

Name of Project: Generic Disease Database (GDB)
Project's Unique ID: 005-32-01-61-02-9006-00-110-246

A. CONTACT INFORMATION:

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1. Does this system contain any information about individuals? Yes

(a) Is this information identifiable to the individual?

Yes

(b) Is the information about individual members of the public?

Yes(

(c) Is the information about employees?

Yes

2. What is the purpose of the system/application?

The GDB System contains all current animal disease/pest monitoring and program databases, which are combined to run on the Animal Plant Health Inspection Service (APHIS) Information Technology Infrastructure (AITI). The databases are accessible from United States Department of Agriculture (USDA), APHIS, Veterinary Services (VS) and each State Animal Health Office, and field locations, States maintain local data bases for some animal disease/pest activities which are used for operational disease monitoring including in some cases test charts and epidemiologic investigations. The data base is used for routine animal health surveillance and domestic disease control programs.

3. What legal authority authorizes the purchase or development of this system/application?

GDB is funded by Congress through appropriated funds for the AHMS budget line item.

C. DATA in the SYSTEM:

1. Generally describe the type of information to be used in the system and what categories of individuals are covered in the system?

There are three categories of individuals covered in this system: **Customer**, **Employee**, and **Other**.

- **Customer** – No information about this individual type is maintained.
- **Employee** -- We maintain employee name, address, and phone information for employees directly involved in disease program activities.
- **Other** -- We also maintain name, address, and phone information for individuals identified as contacts for premises (locations) and owners of animals or animal related operations involved with the various animal disease/pest surveillance and or control programs. Because of the varying nature of the premises, including sole proprietorships, and the undocumented relationship of the contact to the premises, many of the contacts are simply private citizens deserving of protection under the Privacy Act.

2. What are the sources of the information in the system?

(a) Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

The data input sources include information provided directly by the individual, data collection documents completed by employees and other field reports related to disease program activities. Other information that may be used are sources of data that are already available to the general public.

We also use census and other data available through the USDA National Agriculture Statistics Service (NASS) for mapping purposes. This data does not contain personal identifiers.

(b) What Federal agencies are providing data for use in the system?

The USDA Food Safety Inspection Service (FSIS), Farm Services Agency (FSA), APHIS (National Veterinary Services Laboratories (NVSL) and Wildlife Services), USDA National Agriculture Statistics Service (NASS) and US Post Office (address validation) currently provide data for use in the GDB application.

(c) What State and local agencies are providing data for use in the system?

The individual State Veterinarian Offices, as well as multiple state and private animal disease testing laboratories provide data for use in the GDB system.

(d) From what other third party sources will data be collected?

Third party sources of information include the American Veterinary Medical Association (AVMA), National Chicken Council (NCC), National Turkey Federation (NTF), private Individuals and companies who are the subject of the programs for whom we keep data.

(e) What information will be collected from the employee and the public?

Only the contact information identified above.

3. Accuracy, Timeliness, and Reliability

(a) How will data collected from sources other than USDA records be verified for accuracy?

USDA VS employees, state employees and federal employees collecting the data from other sources are responsible for the review and accuracy of the data. Data verification of customer records occurs on an as-needed basis.

(b) How will data be checked for completeness?

The VS state employees and federal employees who collect the data are responsible for the review and accuracy of the data. Also, there are limited systematic data entry constraints to ensure entry completeness.

(c) Is the data current? Yes. What steps or procedures are taken to ensure the data is current and not out-of-date? Each time the premises to

which the PII is associated is re-visited the data is re-validated, either systematically or in person.

(d) Are the data elements described in detail and documented? Yes. If yes, what is the name of the document? Generic Data Base: Data-Entry Workshop Student Manual

D. ATTRIBUTES OF THE DATA:

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes. The database currently contains sufficient items required to regulate and monitor the progress of animal disease and pest programs. During an animal disease outbreak, communications and time are critical to controlling the outbreak. In order to properly monitor the eradication process and to respond to animal health events, contact information for the various premises owners and animal owners involved must be maintained.

2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

Yes. Risk analysis, trend analysis and/or testing may associate animal health information or animal related management practices to the owner of a premises, an animal or an animal related business. These epidemiological analyses may result in the creation of management plans to be implemented on a voluntary or regulatory basis and may involve measures of mitigation such as education, disinfection, quarantine or depopulation of infected animals etc. The data involved for each individual associates him or her to a location, which may then be associated with an adverse event, test result, etc. The only "new" data about an individual is the relationship to a previously unreported event.

3. Will the new data be placed in the individual's record?

No.

4. Can the system make determinations about employees/public that would not be possible without the new data?

Again, the associative relationship may be established.

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

Data validation controls are designed into GDB modules to the fullest extent possible. Data integrity checks are also implemented to assure relevance and accuracy. In addition, the new data will be verified for relevance and accuracy through agency contact with those responsible for collecting the data.

6. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

GDB data is often reported in summarized format without personal identifiers, but it is rarely consolidated except to assure data integrity and accuracy or to organize work within an employee's designated work area.

7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.

GDB uses role-based access control and fine-grained access to restrict who can view, enter, update, or delete animal disease information.

8. How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

Data can be retrieved only by personnel who have logged in with a user ID and password issued by APHIS personnel. Data can be retrieved by personal identifiers such as first name, last name, address or phone number. No Social Security Numbers should be stored in the GDB.

In some voluntary animal health programs data can be retrieved by websites available to the public. Also, limited data may be posted regarding potential disease risks such as identifiers of infected herds or flocks.

9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them? No reports on individuals have been pre-programmed. Ad hoc reporting tools provided offer the capability to produce data listings based on virtually any database field, including those containing PII. Any user assigned the necessary functional role may be able to create such customized reports.

10. What opportunities do individuals have to decline to provide information(i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses and how individuals can grant consent.)

Provision of contact information is voluntary. Once provided, the information will be used in accordance with the routine used identified in the SOR Notice in process.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

Equitable treatment of customers and employees is ensured because the regulatory guidelines dictate the data that is maintained. The GDB only provides information regarding involvement with agency disease programs as determined by applicable policy.

1. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

Requirements are established for program reporting. System use is determined by needs of AVIC's and State Veterinarians. Stand-alone states are responsible for the maintenance of their systems through cooperative agreements between the state and APHIS. States' data that resides on a Federal server are maintained by Federal personnel in a physically secure environment.

2. What are the retention periods of data in this system?

Indefinite.

3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

Not applicable.

4. Is the system using technologies in ways that the USDA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

No.

5. How does the use of this technology affect public/employee privacy?

Not applicable.

6. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.

Yes, but only in relationship to animal disease/pest surveillance and control.

7. What kinds of information are collected as a function of the monitoring of individuals?

As identified earlier, individuals are not monitored. Contact information is kept on private citizens to facilitate the response to an adverse animal health event. It is possible to associate an individual with such an event.

8. What controls will be used to prevent unauthorized monitoring?

The Code of Federal Regulations (CFR) describes what we can and can not do with the monitoring of the data. Access to the system is determined by an authorization process. Usage is monitored systematically to ensure proper use.

9. Under which Privacy Act systems of records notice does the system operate? Provide number and name.

A Systems of Records Notice was prepared under this application's previous name. That Notice is currently under review and will be amended to accommodate the capabilities and features of the current system. The Notice is USDA/APHIS-6, Veterinary Services--Brucellosis Information System and Brucellosis Recording and Reporting System, USDA/APHIS.

10. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

Yes, the SOR will be amended as indicated above.

F. ACCESS TO THE DATA:

1. Who will have access to the data in the system?

State and Federal employees involved with the disease/pest control or surveillance programs have access to the GDB data. Federal, State and contracted IT developers, as well as data entry personnel also have access to the data. There is limited data that is available on public webpages with voluntary program participants and when necessary to advise the public of a potential animal disease/pest risk.

2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

Access to the data is protected by role-based access and is managed by the network firewall, the network passwords, and the Oracle database. Users must have a government issued login and password that is controlled and managed either at the Veterinary Services, National, Regional or Area offices or in the case of local State databases the State Veterinarian's office. Password controls, procedures, responsibilities and policies follow USDA departmental standards. At most sites, responsibility and scope of data access is defined by users' job descriptions. Policy dictates that a user may not 'self-nominate' themselves for access. Requests for access must come from their supervisor or other authorized animal health official. USDA eAuthentication validation is a planned integration component for development.

3. Will users have access to all data on the system or will the user's access be restricted? Explain.

Users' access is restricted based on the role that they are granted. Tighter levels of control, accountability and audit trails are being designed in scheduled maintenance releases.

4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials.)

Access to the data is protected by role-based access and is managed by the network firewall, the network passwords and the Oracle database. Users must have a network and an Oracle id and password that is controlled and managed either at the National, Regional or State Veterinarian offices. At most sites, responsibility and scope of data access is defined by users' job descriptions.

5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, are Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

Contractors are involved in the design and development of the GDB. Privacy clauses are included in the associated contracts. Contractors will not be involved in the ongoing support of the application.

6. Do other systems share data or have access to the data in the system? If yes, explain.

APHIS' Risk Analysis GIS group uses data from GDB to create mapping trends. For the Scrapie program, limited data needed to fulfill identification device orders is shared with the companies making official ear tags and similarly with contract laboratories. GDB also interfaces with other VS systems, including National Animal Identification System (NAIS), Veterinary Services Process Streamlining (VSPS), Emergency Management Response System (EMRS), and National Animal Health Laboratory Network (NAHLN).

State Veterinarians and State Animal Health officials, as owners of the data, have the discretion to share information stored in the GDB in accordance with state laws and regulations via public web sites and/or may store such information in animal health surveillance databases developed by State IT developers, contractors or other third party software vendors in a manner that provides secure data access.

The National Surveillance Unit (NSU) has agency responsibility for reporting surveillance activities on a nationwide basis. The NSU has direct access to the GDB and provides and publishes summarized information to the public and our trading partners. No 'customer', 'employee' or 'other' classifications of private information is published or distributed by NSU to external audiences.

Certain disease information is reported by State and/or Federal animal health authorities. These reports are then summarized in reports to the (OIE) Office International des Epizooties (World Organization for Animal

Health). No 'customer', 'employee' or 'other' classifications of private information is published or distributed to OIE.

Partnerships and MOU's are in place with USGS for the publication of certain Avian Influenza surveillance activities. This summary data is available on a web site for the general public. No 'customer', 'employee' or 'other' classifications of private information is published on this web site.

7. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

USDA APHIS, including the VS Management Team, Regional Directors, Area Veterinarian in Charge (AVIC), Centers for Epidemiology and Animal Health (CEAH), National Surveillance Unit (NSU) and State Veterinarians are all responsible for protecting the privacy rights of the customers and employees identified in the GDB as required by applicable State and Federal laws. An updated SOR Notice for the GDB is being created for publication in the Federal Register.

8. Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)?

Some animal disease information is reported to the (OIE) Office International des Epizooties (World Organization for Animal Health). Some animal disease information is shared with world trading partners provided for risk analysis to demonstrate that US agricultural animal products are safe for export to other countries. Most risk analysis information is summarized information and does not describe detailed record information.

Some animal disease information is shared with state and federal wildlife agencies, as animal disease frequently crossover between domesticated animals and wildlife. All information, by definition, is shared with state animal health officials and state animal health databases.

9. How will the data be used by the other agency?

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

10. Who is responsible for assuring proper use of the data?

USDA APHIS, including the VS Management Team, Regional Directors, Area Veterinarians in Charge (AVIC), Centers for Epidemiology and Animal Health (CEAH), National Surveillance Unit (NSU), National Veterinary Services Laboratories (NVSL) and State Veterinarians are all responsible for assuring proper use of the data. In addition, security controls are enforced to restrict or limit the right information to the right people at the right time.

APPENDIX A DECLARATION OF PRIVACY PRINCIPLES

The privacy principles set forth in this declaration are based on the ethical and legal obligations of the United States Department of Agriculture to the public and are the responsibility of all USDA employees to recognize and treat their office as a public trust.

The obligation to protect client and partner privacy and to safeguard the information clients and partners entrust to us is a fundamental part of the USDA's mission to administer the law fairly and efficiently. Clients and partners have the right to expect that the information they provide will be safeguarded and used only in accordance with law. In recognition of these obligations, policies and procedures must clearly state who should have access to what information and for what purposes. In addition, appropriate limitations must be placed on the collection, use and dissemination of clients and partners' personal and financial information and sufficient technological and administrative measures must be implemented to ensure the security of USDA data systems, processes and facilities.

All USDA employees are required to exhibit individual performance that reflects a commitment to dealing with every client and partner fairly and honestly and to respect the clients and partners' right to feel secure that their personal information is protected. To promote and maintain clients and partners' confidence in the privacy, confidentiality and security protections provided by the USDA, the USDA will be guided by the following Privacy Principles:

Principle 1:	Protecting citizen, client and partner privacy and safeguarding confidential citizen, client and partner information is a public trust.
Principle 2:	No information will be collected or used with respect to citizens, clients and partners that is not necessary and relevant for legally mandated or authorized purposes.
Principle 3:	Information will be collected, to the greatest extent practicable, directly from the citizen, client or partner to whom it relates.
Principle 4:	Information about citizens, clients and partners collected from third parties will be verified to the greatest extent practicable with the citizens, clients and partners themselves before action is taken against them.
Principle 5:	Personally identifiable citizen, client or partner information will be used only for the purpose for which it was collected, unless other uses are specifically authorized or mandated by law.
Principle 6:	Personally identifiable citizen, client or partner information will be disposed of at the end of the retention period required by law or regulation.
Principle 7:	Citizen, client or partner information will be kept confidential and will not be discussed with, nor disclosed to, any person within or outside the USDA other than as authorized by law and in the performance of official duties.
Principle 8:	Browsing, or any unauthorized access of citizen, client or partner information by any USDA employee, constitutes a serious breach of the confidentiality of that information and will not be tolerated.
Principle 9:	Requirements governing the accuracy, reliability, completeness, and timeliness of citizen, client or partner information will be such as to ensure fair treatment of all clients and partners.
Principle 10:	The privacy rights of citizens, clients and partners will be respected at all times and every citizen, client and partner will be treated honestly, fairly, and respectfully.

The Declaration does not, in itself, create any legal rights for clients and partners, but it is intended to express the full and sincere commitment of the USDA and its employees to the laws which protect client and partner privacy rights and which provide redress for violations of those rights.

APPENDIX B POLICY STATEMENT ON CITIZEN, CLIENT AND PARTNER PRIVACY RIGHTS

The USDA is fully committed to protecting the privacy rights of all citizens, clients and partners. Many of these rights are stated in law. However, the USDA recognizes that compliance with legal requirements alone is not enough. The USDA also recognizes its social responsibility which is implicit in the ethical relationship between the USDA and the citizen, client or partner. The components of this ethical relationship are honesty, integrity, fairness, and respect.

Among the most basic of a citizens, clients, or partners' privacy rights is an expectation that the USDA will keep personal and financial information confidential. Citizens, clients and partners also have the right to expect that the USDA will collect, maintain, use, and disseminate personally identifiable information and data only as authorized by law and as necessary to carry out agency responsibilities.

The USDA will safeguard the integrity and availability of citizens, clients and partners' personal and financial data and maintain fair information and record keeping practices to ensure equitable treatment of all citizens, clients and partners. USDA employees will perform their duties in a manner that will recognize and enhance individuals' rights of privacy and will ensure that their activities are consistent with law, regulations, and good administrative practice. In our record keeping practices, the USDA will respect the individual's exercise of his/her First Amendment rights in accordance with law.

As an advocate for privacy rights, the USDA takes very seriously its social responsibility to citizens, clients and partners to limit and control information usage as well as to protect public and official access. In light of this responsibility, the USDA is equally concerned with the ethical treatment of citizens, clients and partners as well as their legal and administrative rights.