

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

National Animal Identification System (NAIS)
(System Name)

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.

Neil Kammerschmitt

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

1/30/08
Date

Jammi Hines

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

1/30/08
Date

Marilyn L. Holland
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1/31/2008
Date



Privacy Impact Assessment

National Animal Identification System (NAIS)

Revision: 1.1

APHIS

Date: January 30, 2008

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

Template Release 070606

USDA PRIVACY IMPACT ASSESSMENT FORM**Agency:** APHIS-VS**System Name:** National Animal Identification System (NAIS)**System Type:**
 Major Application
 General Support System
 Non-major Application**System Categorization (per FIPS 199):**
 High
 Moderate
 Low**Description of the System:**

The National Animal Identification System (NAIS) is a co-operative State-Federal-industry partnership system designed for the purpose of standardizing and expanding animal identification (ID) programs and practices to all animals that would benefit from rapid trace backs in the event of a disease or bioterrorism concern. The goal of the NAIS is to enable 48-hour trace back of the movement of any diseased or exposed animal. This will help to ensure rapid disease containment and maximum protection of America's food and recreational animals.

The NAIS system is comprised of four components: the National Premises ID Allocator (Allocator) and Data Management Center (DMC); Standardized Premises Registration System (SPRS); Animal Identification Number Management (AINM) System; and Animal Trace Processing System (ATPS).

To trace animals, Animal Health Officials (AHO) must know where they are born and where they are moved. Therefore, identifying locations that manage or hold animals—referred to as premises—is the starting point of the NAIS. Therefore, two modules were developed; the NAIS Premises ID Allocator (Allocator) and the Standardized Premises Registration System (SPRS).

The goal of the first component of the NAIS, the SPRS, is to facilitate the registration of premises through a USDA-provided web application. The SPRS utilizes the second component of the NAIS, the Allocator, to validate a location, using an address or other legal description, and to allocate a unique national premises number to the location. The single allocation system ensures the uniqueness of a premises identification number for the entire United States and should minimize the allocation of multiple numbers to the same location. The Allocator utilizes HTTP calls to facilitate integration with other departments and agencies (State, Federal and Private). This integration allows these other entities to develop Compliant Premises Registration Systems (CPRS). A CPRS uses its own front-end/graphical user interface (GUI) application client to communicate

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with the National Premises ID Repository (NPIR) through the Allocator. States and Tribes utilizing their own front end GUI are required to have their application reviewed by USDA to insure the system is compliant. This review must take place before the system is given credentials to use the HTTP calls to the Allocator.

The NAIS DMC is a companion administrative application for the SPRS through which users can directly gain access to the NPIR through a GUI for single premises entry or batch premises processing. People assigned administrative rights can perform many administrative tasks such as premises exception research and management, batch processing management, run queries and reports on existing premises ID data, etc. Both the SPRS and the DMC utilize the NPIR for data storage.

The SPRS provides for a common, free-for-use system for individual States to register locations (premises) and obtain a national premises ID. The data is segregated by database schema on a State-by-State basis.

Basic to Animal tracing is assigning and maintaining unique animal ID and individual records of animal populations from birth throughout lifespan, including movement between premises. The AINM is the component of the NAIS designed to create and distribute unique numbers; to facilitate order and delivery of physical animal tags to premises locations; and to collect and maintain history of the distribution of that device.

The final component of the NAIS is the ATPS. The ATPS is the product of a cooperative effort between State, Federal, and private livestock industries to give the USDA access to public and private Animal Tracking Databases (ATD) during a disease or other health event. ATDs are any public or private client systems that store animal tracking data. The ATPS is designed to give AHOs the ability to complete a trace back for suspected diseased or contaminated animals in 48 hours or less by requesting data from the ATDs.

Who owns this system? (Name, agency, contact information)

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

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

QUESTION 1		
Does the system contain any of the following type of data as it relates to individual:	Citizens	Employees
Name	Y	N
Social Security Number	N	N
Telephone Number	Y	N
Email address	Y	N
Street address	Y	N
Financial data	N	N
Health data	N	N
Biometric data	N	N
QUESTION 2	Y	N
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 ¹		
Are social security numbers embedded in any field?	N	N
Is any portion of a social security numbers used?	N	N
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	N	N



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.

¹ 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 information contained in the system is based on the tracing of animals. General contact information is collected from customers; i.e., name, address, employer or company name, contact numbers, and e-mail. All other information is in regards to the animals in the possession of the customers. The information is comprised of specific data about the animals in the system. Personal information of individuals is only used for verification and contact purposes for the goal of tracing and containment of diseased or exposed animals.

4. 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

5. Sources of the data in the system.

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

General contact information is collected from customers; specifically, name, address, employer or company name, contact numbers, and e-mail. All other information is in regards to the animals in the possession of the customers and only collected during a disease or other health event. Such animal information collected includes: specific systems that provided the information (i.e., premises data, animal ID manufacturers, and animal tracking institutions), Premises ID, Animal ID, date of event, event type, breed, and sex.

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

The USDA Forest Service provides information on range allotments.

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

State Boards of Animal Health and/or Departments of Agriculture and/or agents as assigned by the State.

States

- o Alabama Department of Agriculture
- o Alaska Department of Agriculture
- o Arizona Department of Agriculture
- o Arkansas Department of Agriculture
- o Colorado Department of Agriculture
- o Connecticut Department of Agriculture
- o Delaware Department of Agriculture
- o Florida Department of Agriculture
- o Georgia Department of Agriculture
- o Hawaii Department of Agriculture
- o Idaho Department of Agriculture
- o Illinois Department of Agriculture
- o Indiana Department of Agriculture
- o Iowa Department of Agriculture
- o Kansas Department of Agriculture
- o Kentucky Department of Agriculture
- o Louisiana Department of Agriculture
- o Maine Department of Agriculture
- o Maryland Department of Agriculture
- o Massachusetts Department of Agriculture
- o Michigan Department of Agriculture
- o Missouri Department of Agriculture
- o Montana Department of Agriculture
- o Nebraska Department of Agriculture
- o New Hampshire Department of Agriculture
- o New Jersey Department of Agriculture
- o New Mexico Department of Agriculture
- o New York Department of Agriculture
- o North Carolina Department of Agriculture

- o North Dakota Department of Agriculture
- o Ohio Department of Agriculture
- o Oklahoma Department of Agriculture
- o Oregon Department of Agriculture
- o Puerto Rico Department of Agriculture
- o Rhode Island Department of Agriculture
- o South Carolina Department of Agriculture
- o South Dakota Department of Agriculture
- o Tennessee Department of Agriculture
- o Texas Department of Agriculture
- o Vermont Department of Agriculture
- o Virginia Department of Agriculture
- o Washington Department of Agriculture
- o West Virginia Department of Agriculture

Tribes

- o Fort Belknap
- o Kawerak
- o Navajo Nation
- o San Carlos Apache
- o Walker River Paiute

Other

- o Animal Health Officials

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

- o Manufacturers of physical animal ID tags will provide records of shipments of Animal Identification Number (AIN) IDs from the manufacturers' premises to other non producer premises or to a producer premises.

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- o Animal Tracking Databases (ATDs) such as Ag Info Link, Micro Beef, Global Animal Management, etc., are private organizations evaluated by USDA that provide animal tracking data during a disease or emergency event as declared by the Secretary of Agriculture.
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 in the system is verified by the State AHOs or their agents. NAIS currently requires all premises addresses to be validated by one of three databases (ZP4, Tele Atlas, or Clean Address) or go through the exception process. The exception process is a published Standard of Procedure (SOP) that is designed to verify driving directions (using an electronic map) and insuring they match with the provided Global Positioning Satellite (GPS) coordinates.

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

The system will not allow the submission of data unless it is complete and verified. State AHOs must verify the information prior to entering the data into the system. The system will not allow the data to be stored without providing all the required data.

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

Data is collected from States, Tribes, AHOs, and ID tag manufacturers. ATDs provide data during a foreign animal disease, emergency, or program disease event. The accuracy of Premises Identification Numbers (PINs) and AINs are checked within the system by correlating the issued numbers and the associated event data in the ATPS, with the numbers and associated ID tag data in AINM. Exception reports are generated if there is data that contradicts the completeness of existing information in the system.

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?

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The information collected on individuals is in relation to the tracing of animals, the location of animals currently in their possession and the history of locations for those animals and animals that may have been co-mingled with the animal of interest.

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

- Yes
X 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

- X 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
X No. If NO, go to question 11

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

- 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?

(1) Information is used by Federal and State animal health officials during a foreign animal disease (FAD) outbreak, bioterrorism, or other animal health emergency to

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contain and respond to the emergency event. Specifically, the information aids in the traceback and/or trace forward of exposed and potentially exposed animals.

(2) Information will be referred to the appropriate agency, whether Federal, State, local, or foreign, charged with the responsibility of investigating or prosecuting a violation of law or enforcing or implementing a statute, rule, regulation or order issued pursuant thereto, of any record within this system when information available indicates a violation or potential violation of law, whether civil, criminal or regulatory in nature, and whether arising by general statute or particular program statute, or by rule, regulation or order issued pursuant thereto.

(3) Information will be disclosed to the Department of Justice for use in litigation when the agency, or any component thereof, or any employee of the agency in his or her official capacity, or any employee of the agency in his or her individual capacity where the Department of Justice has agreed to represent the employee, or the United States, where the agency determined that litigation is likely to affect the agency or any of its components, is a party to litigation or has an interest in such litigation, and the use of such records by the department of Justice is deemed by the agency to be relevant and necessary to the litigation; provided, however, that in each case, the agency determines that disclosure of the records to the Department of Justice is a use of the information contained in the records that is compatible with the purpose for which the records were collected.

(4) Information will be disclosed in a proceeding before a court or adjudicative body before which the agency is authorized to appear, when the agency, or any component thereof, or any employee of the agency in his or her official capacity, or any employee of the agency in his or her individual capacity where the agency has agreed to represent the employee, or the United States, where the agency determines that litigation is likely to affect the agency or any of its components, is a party to litigation or has an interest in such litigation, and the agency determines that use of such records is relevant and necessary to the litigation; provided, however, that in each case, the agency determines that disclosure of the records to the court is a use of the information contained in the records that is compatible with the purpose for which the records were collected.

(5) Information will be disseminated to solicit feedback from federal and state animal health officials within the system on emergency preparedness guidelines and the system itself for the purpose of educating and involving the federal and state animal health officials in program development, program requirements, and standards of conduct.

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?

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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?

Appropriate Level 2 eAuthentication logon credentials by users are used to gain access to the system. This access is monitored by USDA officials to ensure authorized and appropriate use of data. Additionally, user roles are established to ensure users have access to certain types of data based on their roles and need to access certain types of data in this 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?

Appropriate Level 2 eAuthentication logon credentials by users are necessary to gain access to the system. This access is monitored by USDA officials for proper usage.

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?

15.3. Where are these procedures documented?

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 data is monitored by the USDA NAIS team. Because of the constant change and update of information, the data is continuously monitored by system users who regularly review the data by running reports and queries. This type of review and monitoring ensures the information in the system is accurate and 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?

State Animal Health Officials, as noted in response to question 5.3, will have access to the data for the purpose of tracing animals upon three identified triggering events: (1) presumptive positive test for foreign animal disease, (2) presumptive positive test for program disease, or (3) declared emergency by the Secretary of Agriculture.

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

The USDA APHIS Veterinary Services Deputy Administrator maintains responsibility for the assuring proper use of the data through written agreements, such as Memoranda of Understanding, Interconnectivity Agreements, and Cooperative Agreements.

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

- Yes
 If NO, go to question 20

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?

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?

DATA ACCESS

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

- USDA Personnel: The only members with direct access to the system will be those internal to APHIS who have been granted access to the system. These will include System Administrators and Database Administrators, in addition to assigned APHIS personnel responsible for auditing and querying data in the application.
- External users include State veterinarians and AHOs as identified in the response to question 5.3 above.

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

Access to the system and data is based on the role of the user. Each user is given permissions based on the need to obtain or update the information.

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

- Yes
 No

Note: The criteria, procedures, controls and responsibilities regarding user access are identified in the Allocator, AINM, ATPS, DMC, and SPRS Technical Requirements documents.

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

User access is restricted within the system to relevant data. The primary implementation is through assignment of roles to user accounts. Each role is mapped to a collection of permissions to access system data and functionality. Administrative roles have the broadest access to system data. A user may be restricted to the information only pertaining to their particular state while others may have access to multiple sets of data.

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

Yes
 No

Note: Procedures to detect/deter browsing and unauthorized user access are identified in the General Application Technical Requirements document.

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.)?

The USDA is responsible for hosting and protecting the data in the system. In particular, the NAIS team is responsible for ensuring that the procedures and protocols for granting access to the system are followed.

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

Customers can contact NAIS through the NAIS web site:

http://animalid.aphis.usda.gov/nais/contact_us/index.shtml

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?

The information contained in the system is based on the tracing of animals. General contact information is collected from customers. All other information is in regards to the animals in the possession of the customers. The information is comprised of specific data about the animals in the system. Personal information of individuals is only used for verification and contact purposes for the goal of tracing and the containment of diseased or exposed animals. Information on individuals only includes name, address, employer or company name, contact numbers, and e-mail.

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

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.)?

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Data can be retrieved by animal ID, premises ID, premises address, and premises contact name.

- 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)

The System of Records Notice (SORN) is pending publication.

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

No because the SORN is currently being developed for publication. Any existing modifications will be included in the initial publication of the SORN. Future modifications of the system will result in an analysis of the SORN to determine whether revision of the SORN is necessary.

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.

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THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE/CYBER SECURITY