



Privacy Impact Assessment

Emergency Management Response System (EMRS)

Revision: 1.0

APHIS

Date: January 18, 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

System Name: Emergency Management Response System (EMRS)

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

System Categorization (per FIPS 199): High
 Moderate
 Low

Description of the System:

Veterinary Services' staff utilizes EMRS to manage and investigate outbreaks of foreign animal diseases (FADs) in the United States, to document surveillance of foreign animal disease, and to document investigations of emerging animal diseases in the United States. In the event of the introduction of a foreign animal disease into the domestic livestock or poultry populations, Veterinary Services responds by activating its Incident Command System (ICS). There are six ICS teams. Team members are highly trained to control and eradicate exotic diseases and parasites anywhere in the United States. ICS personnel confirm the presence of exotic disease, inspect infected and exposed animals, and appraise the value of animals that may have to be destroyed. These individuals conduct vaccination programs and epidemiological studies and also dispose of animal carcasses, clean and disinfect premises, set and enforce regulations against disease spread, and control disease carriers. The ICS team members use the EMRS in performing these functions. Since the initial deployment of EMRS, an instance has been set up to store the routine foreign animal disease investigation data for each state.

Who owns this system?

Dr. Jose R. Diez, Associate Deputy Administrator - Emergency Management & Diagnostics
USDA, APHIS, VS
(301) 734-8073

Who is the security contact for this system?

Ms. Terry Luckau,
USDA, APHIS, VS
(970)494-7330

Who completed this document?

Ms. Kimberly Vander Haar
USDA, APHIS, VS
(970)494-7347

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	Y
Social Security Number	N	Y
Telephone Number	Y	Y
Email address	N	Y
Street address	Y	Y
Financial data	N	Y
Health data	N	Y
Biometric data	N	N
QUESTION 2 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	Y	Y
Are social security numbers embedded in any field?	N	Y
Is any portion of a social security numbers used?	N	Y
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	N	Y

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.

There are several categories of individuals covered in this system: Customer and Employee.

3.1 Customer – Stored in the Investigation Module:

- Owner or operator – owner or operator of the premises where the animals subject to an investigation are located: name, address, city, state, zip code, county, phone number, and latitude/longitude coordinate.
- Referring contact – whoever provided initial premises information: name and phone number.
- Case coordinator – whoever is responsible for the premises investigation: name, phone number, email address.

3.2 Employee – Stored in Administrative/Emergency Qualifications System (EQS) modules:

- Full name; agency, program; group; organization (level 3-5), encrypted social security number; grade; series; step; official title; working title; duty city; duty state; travel card (Y/N); purchase card (Y/N).
- Home address, city, state, zip code, county, phone number, and email address; latitude/longitude coordinates; emergency contact name, relationship, and number; work address, city, state, zip code, county, region, phone number, supervisor name, phone number, and email address; field address, city, state, county, zip code, phone number, and email address.
- Personal Protective Equipment type, size and model; fit tester name; fit test date.
- Existing skills/experience; desired skills/experience.
- Position certifications; certification type; certified by; certified date; renewed by; renewal date; next renewal date.
- AgLearn training courses, date taken; external training and orientation taken, date taken.
- Medical clearance type, requested by, exam date, approved by, approval date; restrictions, comments.
- Current duty assignment, forecasted rotations, past rotations, non-arrivals, and cancelled rotations.
- Description of property or fleet assigned to employee, date assigned, due date, returned date.

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?

- o Owner or operator – name, address, city, state, zip code, county, phone number, and latitude/longitude coordinates,
- o Referring contact -- name and phone number.
- o Case coordinator – name, phone number, email address.

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

- o National Finance Center
- o AgLearn

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

- o The individual State Veterinarian Offices and various Disease Program Laboratories provide data for use in EMRS, depending upon the geographic extent of the particular animal disease outbreak and dependent upon if an appropriate data sharing Memorandum of Understanding (MOU) is in place with the USDA.

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

- o Private individuals or companies who are the subject of the programs for whom USDA keeps data. Third party providers utilizing U.S. Postal Service (USPS) address data in the National Animal Identification System (NAIS) allow for address validation. Federal Occupational Health provides Medical Clearance Approvals. Geospatial Information System (GIS) mapping module occasionally utilizes data from the U.S. Geological Survey, and other Federal sources available to the public.

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?

- Authorized federal, state, or temporary EMRS personnel that collect and enter the data are responsible for the review and accuracy of the data. See question 3 for additional checks. Information is obtained from either the customer or the employee and is often supplemented during an investigation by on-site visit, USPS database, or other address-validation database. There are also limited data entry constraints to ensure entry completeness. Employee training data is updated weekly. USDA AgLearn dumps data into two text files: One file contains training completion data and the other file contains information about the employee. Details can be found in the document titled 'AgLearn Data Import Procedure.doc'. Other employee data is updated biweekly. USDA NFC sends employee data to EMRS in a password protected spreadsheet. Details can be found in the document titled 'NFC Import Procedure.doc'. APHIS employees also have access to the EMRS Administrative module where they may edit and maintain their own employee profiles. Occasionally the EMRS team will receive a spreadsheet listing employee certifications for a group of employees. EMRS has a procedure for updating employee certifications automatically.

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

- Authorized federal, state, or temporary EMRS personnel that collect and enter the data are responsible for the review and accuracy of the data. See question 3 for additional checks. Information is obtained from either the customer or the employee and is often supplemented during an investigation by on-site visit, USPS database, or other address-validation database. There are also limited data entry constraints to ensure entry completeness. Employee training data is updated weekly. AgLearn dumps data into two text files: One file contains training completion data and the other file contains information about the employee. Details can be found in the document titled 'AgLearn Data Import Procedure.doc'. Other employee data is updated biweekly. NFC sends employee data to EMRS in a password protected spreadsheet. Details can be found in the document titled 'NFC Import Procedure.doc'. APHIS employees also have access to the EMRS Admin module where they may edit and maintain their own employee profiles. Occasionally the EMRS team will receive a spreadsheet listing employee certifications for a group of employees. EMRS has a procedure for updating employee certifications automatically.

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

- Authorized federal, state, or temporary EMRS personnel that collect and enter the data are responsible for the review and accuracy of the data. See question 3 for additional checks. Information is obtained from either the customer or the employee and is often supplemented during an investigation by on-site visit, USPS database, or other address-validation database. There are also limited data entry constraints to ensure entry completeness. Employee training data is updated weekly. AgLearn dumps data into two text fields: One file contains training completion data and the other file contains information about the employee. Details can be found in the document titled 'AgLearn Data Import Procedure.doc'. Other employee data is updated biweekly. NFC sends employee data to EMRS in a password protected spreadsheet. Details can be found in the document titled 'NFC Import Procedure.doc'. APHIS employees also have access to the EMRS Admin module where they may edit and maintain their own employee profiles. Occasionally the EMRS team will receive a spreadsheet listing employee certifications for a group of employees. EMRS has a procedure for updating employee certifications automatically.

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 APHIS Veterinary Services staff utilizes EMRS to manage and investigate outbreaks of foreign animal diseases (FADs) in the United States, to document surveillance of foreign animal disease, and to document investigations of emerging animal diseases in the United States.

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?

- Data from EMRS is spatially enabled to another server running Microsoft SQL Server to provide the GIS Mapping component for EMRS. Data from EMRS also is placed in Oracle tables as a backend relational extension of EMRS. Testing laboratories will be receiving limited data elements when samples are submitted to the lab for testing and will provide test results for samples submitted back to EMRS. EMRS data may eventually be housed in a data warehouse once developed; data access will be managed with the same rules as EMRS. Data from EMRS is sometimes analyzed by other CEAH personnel using a Statistical Analysis System. Limited fields of Employee

data in the EMRS Employee profile are used to feed information through XML exports to the Forest Service's Resource Order and Status System (ROSS) to allow APHIS to be dispatched to national scope, all hazard incidents if needed.

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)?

- 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?

- o The new data will be verified for relevance and accuracy through agency contact with those responsible for collecting the data. Any disease associated data will be reviewed by trained veterinary epidemiologist to determine validity of data.

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?

- o The APHIS Veterinary Services staff utilizes EMRS data to manage and investigate outbreaks of foreign animal diseases (FADs) in the United States, to document surveillance of foreign animal disease, and to document investigations of emerging animal diseases in the United States.
- o Additionally, Data from EMRS is spatially enabled to another server running Microsoft SQL Server to provide the GIS Mapping component for EMRS. Data from EMRS also is placed in Oracle tables as a backend relational

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extension of EMRS. Testing laboratories will be receiving limited data elements when samples are submitted to the lab for testing and will provide test results for samples submitted back to EMRS. EMRS data may eventually be housed in a data warehouse once developed; data access will be managed with the same rules as EMRS. Data from EMRS is sometimes analyzed by other CEAH personnel using a Statistical Analysis System. Limited fields of Employee data in the EMRS Employee profile are used to feed information through XML exports to the Forest Service's Resource Order and Status System (ROSS) to allow APHIS to be dispatched to national scope, all hazard incidents if needed.

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?

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?

- o EMRS use Lotus Notes role based access control to restrict who can enter key disease control information. The VS management team, Emergency Program (EP) staff, and Regional Directors will determine when data needs to be consolidated and then make sure data is protected from unauthorized access or use based on user roles as well.

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?

- o The VS management team, EP staff, and Regional Directors determine when processes need to be consolidated and then make sure any data involved is protected from unauthorized access or use.

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?

- o After an animal disease outbreak, data is burned onto a CD and distributed to outbreak management personnel and kept for an indefinite time. Routine FAD EMRS data is expected to be retained on the server for an indefinite time. Employee data is maintained as long as employee is employed and may be maintained for up to 5 years after employment ceases in case employee is reemployed during emergencies.

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

- o The VS management team, Emergency Program staff, and Regional Directors will determine the processes at the time for purging, in accordance with USDA policies.

15.3. Where are these procedures documented?

- o USDA record retention policy documentation.

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?

- o Employee training data is updated weekly. AgLearn dumps data into two text fields: One file contains training completion data and the other file contains information about the employee. Details can be found in the document titled 'AgLearn Data Import Procedure.doc'. Other employee data is updated biweekly. NFC sends employee data to EMRS in a password protected spreadsheet. Details can be found in the document titled 'NFC Import Procedure.doc'. APHIS employees also have access to the EMRS Admin module where they may edit and maintain their own employee profiles. Occasionally the EMRS team will receive a spreadsheet listing employee certifications for a group of employees. EMRS has a procedure for updating employee certifications automatically. Additionally, after an animal disease outbreak, data is burned onto a CD and distributed to outbreak management personnel and kept for an indefinite time. Routine FAD EMRS data is expected to be retained on the server for an indefinite time. Employee data is maintained as long as employee is employed and may be maintained for up to 5 years after employment ceases in case employee is reemployed during emergencies.

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?

- o When other federal or state emergency response agencies assist USDA with an emergency animal disease outbreak, they may be allowed limited access to the data in EMRS. This access depends upon the MOU in place, and the need to know of the other agency.

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

- o The VS management team, Emergency Program staff, and Regional Directors will determine the sharing processes at the time of the emergency on a case-by-case basis.

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

- Yes
 No. 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?

- o The VS management team, Emergency Program staff, and Regional Directors will determine the sharing processes at the time of the emergency on a case-by-case basis.

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?

- o APHIS EMRS is based on the Domino Server and Lotus Notes system. Lotus Notes has a feature that automatically replicates (copy) data base information to servers based on information stored in connection documents. All EMRS data is stored and replicated every 15 to 60 minutes between 3 master EMRS servers: cmrs05 (in Riverdale), cmrs01, and cmrs04 (in Fort Collins). If local EMRS field servers are established on the site of an outbreak, field server(s) data is automatically replicated to master EMRS servers as well. The security policy and access rights are global so no differences exist between locations.

DATA ACCESS

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

- o Authorized federal, state, or temporary EMRS users/managers will have read-only or input/update access to all investigation or administrative data as determined by their incident command/investigation position/role. System administrators and developers have full access to all data in the system.

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

- o Authorized federal, state, and temporary personnel are granted access to EMRS data for a specific animal disease instance they are assigned to according to their ICS job responsibilities. Select incident command personnel with a need to know are granted access to EMRS data during an incident depending on their level of authority. All federal personnel in VS area offices and all state personnel in their corresponding state office have access to routine FAD data for their state. Selected regional office epidemiologists, EP staff personnel, and lab personnel have access to routine FAD investigation data for all 50 states if job duties justify access level. Other cooperating federal agencies, such as Federal Occupational Health, are granted access only on a case by case as needed basis primarily for safety and health reasons. Federal personnel are reminded that all USDA data use must comply with conditions of employment, which include limited use of data for stated purposes and non-disclosure to outside sources subject to applicable penalties. All contractors performing work for USDA must request and justify access needed, which is approved by EMRS managers after the contractor signs non-disclosure agreements. Documentation of access procedures and explanation of fine grain access procedures using access groups are currently documented in user and security documentation.

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

- Yes
 No

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

- o Authorized federal, state, and temporary personnel have access to EMRS data for a specific animal disease instance and specific data according to the job they have been assigned by Incident Command. Selected incident command personnel have access to all data during an incident based on a need to know. Federal personnel in VS area offices and state personnel in their corresponding state office have access to routine FAD data for only their state. Selected regional office epidemiologists, EP staff personnel, and lab personnel have access rights to routine FAD investigation data for all 50 states. EMRS uses fine grain access to protect sensitive data fields and limit access to data depending on the responsibilities of the individual. A limited number of individuals have global access, primarily EMRS managers, programmers and executive level managers.

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.)?

- o The VS management team, EP staff, Regional Directors, AVIC's, State Veterinarians and EMRS team members and authorized users are all responsible for protecting the privacy rights of the customers and employees affected by the interface. The Login interface reminds users of their responsibility every time they log in.

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

Director, Freedom of Information and Privacy Act Staff
Legislative and Public Affairs
USDA: APHIS
4700 River Road
Riverdale, MD 20737-1232

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 system will allow for due process and comply with the American Disabilities Act (ADA) for Section 508 Compliance.

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.)?

- o Data can be retrieved only by personnel who have logged in with a user ID and password issued by APHIS personnel. If data is retrieved via the web, log files will track exact data queried. If data is retrieved via the Notes client, no record of data queried is kept but individual must have user access and rights to access data. Data can be retrieved by a full text search or a defined search. The full text search allows any data matching the entered data element to be retrieved. In the Investigation module, defined search data can be retrieved by: Premises ID, Reference Control Number, Premises Name, Incident Group, or Incident Site. In the Administration module, defined search data can be retrieved by: employee, property, fleet vehicle, ledger, last name, first name, employee ID, nickname, title, organization, or section.

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)

- o The system of records notice for APHIS's Emergency Management Response System is currently in draft and will be published soon.

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

- o No, because the Initial SOR is still in review.

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.

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Emergency Management Response System (EMRS)
(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.

José R. Díaz 03/25/08
System Manager/Owner Date
OR Project Representative
OR Program/Office Head.

Tonya G. Woods 3/24/08
Agency's Chief FOIA officer Date
OR Senior Official for Privacy
OR Designated privacy person

Marilyn L. Holland 3/25/08
Agency OCIO Date