

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

User Fee System (UFS)
(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.

1-24-2008
System Manager/Owner Date
OR Project Representative
OR Program/Office Head.

1/23/08
Agency's Chief FOIA officer Date
OR Senior Official for Privacy
OR Designated privacy person

Amy M. Snyder, acting CIO 1/24/08
Agency OCIO Date



Privacy Impact Assessment

User Fee System

Revision: 1.0

APHIS

Date: January 8, 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: User Fee System

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

System Categorization (per FIPS 199): High
 Moderate
 Low

Description of the System:

User Fee System (UFS) is a system that links USDA APHIS collection centers with processing and management units. UFS provides a unified and automated process to track the user fees collected by Veterinary Services' (VS) sites across the nation. UFS processes standard billing and fee information.

Who owns this system?

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Who is the security contact for this system?

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Who completed this document?

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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		Citizens	Employees
Does the system contain any of the following type of data as it relates to individual:			
Name		Y	N
Social Security Number		Y	N
Telephone Number		Y	N
Email address		N	N
Street address		Y	N
Financial data		Y	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?		Y	N
Is any portion of a social security numbers used?		Y	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.

APHIS-81 forms are used to collect information from customers in an effort to assess and collect fees for services provided by Veterinary Services. For example, fees are collected for inspection of livestock crossing the border.

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?

Customer name, address, Taxpayer ID, date of service, charges (type of service received, rate, and quantity), and payments made (form of payment, amount of payment) including telephone and fax numbers.

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

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?

None

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

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

Customers request an APHIS credit account application and submit to APHIS MRPBS FMD Minneapolis. APHIS MRPBS FMD MINNEAPOLIS runs a credit check through Dunn & Bradstreet. APHIS MRPBS FMD MINNEAPOLIS then enters the request for an APHIS Credit account into the National Finance Center (NFC) Financial Foundation Information System (FFIS). NFC validates the taxpayer ID and name on the account. NFC approves the account. Once the account is approved by NFC, APHIS MRPBS FMD MINNEAPOLIS enters the account into the National User Fee database.

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

No data is collected from USDA sources.

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

No data is collected from non-USDA sources.

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 data is used to assess and collect fees for services provided by Veterinary Services. This includes tracking payment history (i.e., payments made in cash, check, or credit card as well as non payment history). It also includes the type(s) of services provided by VS.

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

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- 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?

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?

The data is used to produce a statement of services for customers receiving services provided by Veterinary Services. If the customer is using their APHIS credit account, this information is used to bill the customer. In addition, this data is used for the following reasons: (1) to provide a receipt to the customer (2) to established a user fee credit account for billing customers (3) to collect funds on delinquent accounts (bad checks) and (4) issue refunds in the event of an overpayment.

In the case of delinquent accounts, once the Agency has exhausted its debt management efforts, information in this system will be referred to the following:

1. Department of the Treasury to offset against tax refunds that may become due to the debtors for the tax year in which referral is made in accordance with IRS regulations at 26 CFR 301.6402-6T, offset of past-due, Legally Enforceable Debt Against Overpayment, and under the authority contained in 31 U.S.C. 3720A.
2. Non-tax debts or claims that are delinquent for 180 days will be sent to the Department of Treasury or to other Federal agencies designated by the Secretary of the Treasury for the purpose of offsetting Federal payments to collect

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delinquent debts, owed to the Federal Government. Records will be matched by the Taxpayer Identification Number (TIN) and name. For an individual, the TIN is the social security number. For a business, the TIN is the Employer Identification Number. The release of this information is in accordance with 31 U.S.C. 3716 and 4 CFR part 102.

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?

User Fee data from each of the Veterinary Services sites is consolidated into the National UFS database. No additional fields are loaded to the National UFS database. Data is stored in a database within the APHIS firewall. Only users with need to know are given access to the data. Verified users are given the least amount of privileges needed. Users are required to change their passwords every 90 days and secure password rules are enforced

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?

Currently, the system is under an A-123 deficiency corrective action plan which is being monitored for correction by APHIS' CIO and USDA's OCIO offices.

DATA RETENTION

15. Is the data periodically purged from the system?

- Yes
 No. If NO, go to question 16

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

- Paper – 6 years 3 months for non-account holders
- Electronic (no limit) – Validation of control numbers is needed to ensure no duplicate occurs. Control numbers issued to vendor accounts are transmitted to FFIS for billing information on account statements. For example, UFS control numbers issued in 199X are not used in 200X.

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

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?

To ensure accuracy, relevancy, and timeliness, data older than seven years is written to archive tables which have read-only access. A series of audit tables have been implemented to track any changes to the data. Additionally, data integrity checks are in place in the data entry forms to ensure that valid data is entered.

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 How will the data be used by the other agency?

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

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

- Yes
 No. If NO, go to question 20

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

None. All connectivity is internal to USDA. The interconnectivity agreement was signed between USDA, OCFO and APHIS 7/25/05. It will be renewed in FY 08.

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

- Yes
 No. If NO, go to question 21

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

Client/server software is installed on each site allowing each site to use the database in the same manner. Additionally, all database objects relating to User Fee System are consistent among all sites. When modifications are necessary, scheduled releases of software occur. Users are given specific deadlines for implementing the new release.

DATA ACCESS

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

APHIS Veterinary Services import/export clerks, Area Veterinarians in Charge, Port Veterinarians, APHIS NVSL user fee users, APHIS MRPBS FMD MINNEAPOLIS employees, APHIS MRPBS FMD MINNEAPOLIS IT Specialists, APHIS VS IT specialists.

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

Access is requested by APHIS VS users to their local APHIS VS IT System Administrator or to the VS Database Administrator (DBA). Verification is made that the users are APHIS employees. Access is requested by the APHIS VS user's Supervisor to their local APHIS VS IT System Administrator or to the VS Database Administrator (DBA). User IDs are established on the local database, as well as the national user fee database, if needed.

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

Yes
 No

Note: User Fee has several security documents such as security user guide and trusted facility manual.

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

Each VS user only has access to his/her own state's data. APHIS MRPBS FMD MINNEAPOLIS users have access to all of the data. Each port user only has access to his/her port's data. Only users with UFS privileges have access to the UFS data.

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

Yes
 No

Per the A-123 corrective actions, auditing policies and oversight are being implemented.

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.)?

APHIS is responsible for protecting the customer's privacy rights. The UFS databases are behind federal firewalls. Only APHIS users with need to know are given access to the data. Verified users are given the least amount of privileges needed. Users are

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required to change their passwords every 90 days and secure password rules are enforced.

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

A customer can call the User Fee Helpline in Minneapolis at 1-877-777-2128, 612-336-3400 or email at abshelpline@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?

Strict processes are followed to ensure equitable treatment of customers and execution of the UFS program. VS regulations are in place and are followed to ensure all customers are treated fairly and consistently. Additionally, the UFS system does not contain any data that can segregate customers.

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

Strict processes are followed to ensure equitable treatment of customers and execution of the UFS program. VS regulations are in place and are followed to ensure all customers are treated fairly and consistently. Additionally, the UFS system does not contain any data that can segregate customers.

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.)?

Data can be queried by APHIS account number, NFC ID, customer name, address.

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 User Fees System operates under the USDA-APHIS-1 Investigative and Enforcement Records Regarding Regulatory Activities System of Records Notice (SORN). It also operates under Routine Use #1 of the USDA/OCFO-3 Billings and Collections Systems SORN.

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

Yes. The USDA-APHIS-1 Investigative and Enforcement Records Regarding Regulatory Activities SORN is currently under revision and will be published in the Federal Register upon completion.

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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