



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

## **Privacy Impact Assessment**

**National Animal Health Laboratory Network (NAHLN)**

*Revision: 1.2*

*APHIS-VS-NVSL*

*Date: May 19, 2009*



## **NOTE**

**PLEASE SUBMIT A COMPLETED COPY TO THE APHIS INFORMATION SECURITY BRANCH (ISB) FOR A QUALITY ASSURANCE REVIEW PRIOR TO SUBMITTING TO THE PRIVACY OFFICER.**



## Document Information

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Revision History			
Revision	Date	Author	Comments
1.0	01/18/2008	Kimberly Vander Harr	Initial Draft
1.1	03/12/2009	Stephanie Hadsall	Migrated SSP to the new departmental template. Updated language on how data is retrieved from the system
1.2	5/19/2009	Bonnie Coyle	Revisions made in response to comments following the Security Management Team review of the PIA.

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# 1 System Information

System Information	
Agency:	APHIS-VS-CEAH
System Name:	National Animal Health Laboratory Network (NAHLN)
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low





<p>Description of System:</p>	<p><b>NAHLN Program Background</b></p> <p>The National Animal Health Laboratory Network (NAHLN) forms part of a nationwide strategy to coordinate the work of all organizations providing animal health surveillance and testing services.</p> <p>At the Federal level, the U.S. Department of Agriculture's (USDA) National Veterinary Services Laboratories (NVSL) serves as the national veterinary diagnostic reference and confirmatory laboratory. The State/university laboratories in the NAHLN perform routine diagnostic tests for endemic animal diseases as well as targeted surveillance and response testing for foreign animal diseases.</p> <p>Networking these resources provides an extensive infrastructure of facilities, equipment, and personnel that are geographically accessible no matter where disease strikes. The laboratories have the capability and capacity to conduct nationwide surveillance testing for the early detection of an animal disease outbreak. They are able to test large numbers of samples rapidly during an outbreak and to demonstrate freedom from disease after eradication.</p> <p>Key elements of the NAHLN system include increased and more flexible capacity for laboratory support of routine and emergency animal-disease diagnosis and official responses to bioterrorism events; standardized, rapid diagnostic techniques used at the State, regional, and national levels; secure systems for communication, issuance of alerts, and reporting; and modern equipment and experienced personnel.</p> <p>Information technology systems support the NAHLN vision by providing electronic interconnectivity between diagnostic-sample collectors, NAHLN laboratories, and national databases. By utilizing data and messaging standards established by veterinary medical and public-health agencies, accurate and consistent diagnostic information is quickly and securely transmitted, aggregated, and available for decision makers and analysts.</p>
<p>Who owns this system? (Name, agency, contact information)</p>	<p>Dr. Elizabeth A. Lautner USDA- APHIS-VS-NVSL (515) 663-7301</p>
<p>Who is the security contact for this system? (Name, agency, contact information)</p>	<p>Elinor Z. Gallelli USDA-APHIS-VS (970) 494-7333</p>
<p>Who completed this document? (Name, agency, contact information)</p>	<p>Stephanie Hadsall and Bonnie Coyle APHIS-VS-NVSL (515) 663-7731</p>



## 2 Data Information

### 2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p>Patient (animal) owner related data includes:            First Name, Middle Name, Last Name, Phone Number, Fax Number, Street Address, City, State, Zip Code, Country, E-Mail Address</p> <ul style="list-style-type: none"> <li>This patient owner information is maintained in AHSM. A unique identifier is used to link the NAHLN test result information back to the patient owner information.</li> </ul> <p>Employee related data includes:            First Name, Middle Name, Last Name, Phone Number, Fax Number, Street Address, City, State, Zip Code, Country, E-Mail Address</p> <p>Other data includes laboratory operations information, laboratory identification, laboratory location, test methods, test results, test instruments, patient (animal) information, patient emergency contact information, communication integrity information</p>
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	
3	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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	Information in this system comes primarily from -APHIS-VS-National Veterinary Services Laboratories and State veterinary diagnostic laboratories.
4.1	What data is being collected from the customer?	None
4.2	What USDA agencies are providing data for use in the system?	USDA-APHIS-VS-National Veterinary Services Laboratories

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No.	Question	Response
4.3	What state and local agencies are providing data for use in the system?	State veterinary diagnostic laboratories
4.4	From what other third party sources is data being collected?	None
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Not applicable
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	<p>The following steps are taken for data verification:</p> <ol style="list-style-type: none"> <li>1. Submission form received and data entered by receiving technician.</li> <li>2. Testing is performed and documented by lab technician.</li> <li>3. Test results are entered into the system by a data entry clerk or lab technician.</li> <li>4. Lab Manager checks for accuracy, by reviewing submission documents and tests result document that were entered into the system by a clerk or technician.</li> <li>5. Case Coordinator verifies completeness of data by reviewing documents and/or taking reasonable person approach.</li> </ol> <p>Accuracy verification: rules are enforced to confirm that the correct patient animal species and specimen types are tested for specific animal health programs, and that the correct test result type is reported for specific animal health programs.</p> <p>Relevance verification: rules are enforced to confirm that the laboratory reporting test results is officially registered in the NAHLN laboratory registry.</p> <p>Timeliness verification: information dissemination reports and graphs can be generated to track the average time between specimen collection date and date test result was reported.</p> <p>Completeness verification: rules are enforced for required data elements to be submitted with each lab report.</p>
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Same as answer to 5.2

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## 2.2 Data Use

No.	Question	Response
6	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 principal purpose of NAHLN is to support VS animal health program and surveillance activities for the purposes of detecting disease events and trends, controlling and/or eradicating endemic diseases, and determining prevalence of trade-significant diseases.
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	
8	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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	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.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	n/a
10	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 intended routine uses of NAHLN include supporting VS animal health program and surveillance activities for the purposes of detecting disease events and trends, controlling and/or eradicating endemic diseases, and determining prevalence of trade-significant diseases.
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	n/a



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No.	Question	Response
12	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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	<p>The system has been categorized as a Moderate impact system and subject to 17 families of controls identified in the baseline security requirements of Annex 2 of NIST SP 800-53, Recommended Security Controls for Federal Information Systems.</p> <p>Among the controls employed are: role-based access controls, data encryption in transmission, physical and environmental protection, auditing, configuration management and contingency planning.</p>
13	Are processes being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	<p>The system has been categorized as a Moderate impact system and subject to 17 families of controls identified in the baseline security requirements of Annex 2 of NIST SP 800-53, Recommended Security Controls for Federal Information Systems.</p> <p>Among the controls employed are: role-based access controls, data encryption in transmission, physical and environmental protection, auditing, configuration management and contingency planning.</p>

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## 2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	Electronic records are retained within the system for 50 years, incremental and full system tape backups are retained for 1 month. APHIS ITD retains 1 full month backup for one year.
14.2	What are the procedures for purging the data at the end of the retention period?	Backup tapes are over-written according to the Tape Rotation Policies and Procedures.
14.3	Where are these procedures documented?	The SOP for Tape Rotation Policies and Procedures is retained by the APHIS Information Technology Division.
15	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 date the lab test was completed will be stored and evaluated to determine relevance and timeliness. Laboratories have the capacity to update laboratory findings, but only the organization that reported the information will have the right to update it. This will ensure accuracy and completeness over time.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No





## 2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	State laboratories will have the right to access the data, and only the data, they submitted to the system in order to review accuracy and completeness.
17.2	Who is responsible for assuring the other agency properly uses the data?	<p>State laboratory system users are only provided the right to access their own data. Prior to granting any NAHLN laboratory personnel access to the NAHLN system, the NAHLN program staff must receive a request from the individual that wants access to the NAHLN IT system.</p> <ul style="list-style-type: none"> <li>• First, it is verified that the person requesting access is associated with a NAHLN laboratory.</li> <li>• Next it is determined if they are requesting an appropriate User Role for their level of involvement with the NAHLN IT system.</li> <li>• Then they must complete the USDA IT Security Awareness Training and APHIS Security Agreement and Rules of Behavior form.</li> </ul> <p>All individuals provided access to the NAHLN IT system are required to complete annual Information Technology (IT) Security Awareness Training as well as the APHIS Security Agreement and Rules of Behavior form.</p>
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	No, but these agreements are planned and plan of action and milestone will be created to manage this task.
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	n/a

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## 2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Laboratory users will have access to data they have submitted, and only have access to their laboratory's data. VS Animal Health Program and Surveillance staff will have access to data appropriate for their region or program. Lab Data Transmission support staff will have access to the data. System and Database Administrators will have access to the data.
21	How will user access to the data be determined?	User access will be controlled via role based, laboratory where employed, and regional responsibility access control. Criteria, controls and responsibilities have been documented in user access matrices. Procedures have been defined in user guides associated with system modules.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	The principle of least privilege is employed on this system. Each user's access will be restricted based on user role, laboratory where employed, and region of assigned responsibility for animal health. Only an Administrator would have access to all data. An extremely restricted number of administrators will be designated.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



## 2.6 Customer Protection

No.	Question	Response
24	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.)?	USDA APHIS, including the VS Management Team, NVSL, and NAHLN participating state laboratories, are responsible for protecting the privacy rights of customers and employees identified in NAHLN as required by applicable laws.
25	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
26	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?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: <ul style="list-style-type: none"> <li>▪ Consolidation and linkage of files and systems</li> <li>▪ Derivation of data</li> <li>▪ Accelerated information processing and decision making</li> <li>▪ Use of new technologies</li> </ul> Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	No data will be collected that will allow customers to be treated unfairly.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	



### 3 System of Record

No.	Question	Response
30	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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Records are retrieved by using the specimen identification number, a bar coded alpha-numeric number representing the specimen (i.e., a tissue or blood sample), or a laboratory submission identification number generated from the submitting laboratory's information management system. Records including laboratory employee information such as name, emergency contact information, proficiency test results, and authorization to perform various tests may be retrieved by authorized users.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at <a href="http://www.access.GPO.gov">www.access.GPO.gov</a> .)	A POA&M (ID 11286) has been established in the Department's CSAM tool to track the progress of the SOR.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other:

### 4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	The system will not affect customer privacy.



## 5 Completion Instructions

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

National Animal Health Laboratory Network (NAHLN)  
(System Name)

This document has been completed in accordance with the requirements of the E-Government 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.

Paul Hauer for Beth Lautner  
System Manager/Owner  
OR Project Representative  
OR Program/Office Head

3 JUN 09  
Date

[Signature]  
Agency ISSPM/CISO

June 6, 2009  
Date

Joyce G. Woods  
Agency's Chief FOIA Officer  
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