



Privacy Impact Assessment

User Fee System

Revision: 1.0

*Animal and Plant Health Inspection
Service (APHIS) – Veterinary
Services (VS)*

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Document Information

Owner Details	
Name	John Picanso
Contact Number	(301) 734-3579
E-mail Address	John.Picanso@aphis.usda.gov

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Distribution List			
Name	Title	Agency/Office	Contact Information
John Picanso	VS Chief Information Officer/ System Owner	APHIS VS CIO	(301) 734-3579
John Clifford	VS Deputy Administrator /Authorizing Official (AO)/ Designated Approving Authority (DAA)	APHIS VS CIO	(202) 720-5139
Marilyn Holland	Certification Agent	APHIS MRPBS ITD	(301) 851-2900
Ja'Nelle Devore	ISSPM	APHIS MRPBS ISB	(301) 851-2483
Elinor Gallelli	ISSM	APHIS VS CIO	(970) 494-7333
Orlando Baca	VS Director of Technology	APHIS VS CIO	(970) 494-7346
Carlo Broglio	Director, VS Portfolio Program Office (PPO)	APHIS VS CIO	(301) 734-6953
Cecilia Fuller	Subject Matter Expert/User Representative	APHIS VS CIO	(970) 494-7296
William Gross	Project Manager	APHIS VS CIO	(301) 734-0793



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1 System Information

System Information	
Agency:	Animal and Plant Health Inspection Services (APHIS) – Veterinary Services (VS)
System Name:	User Fee System (UFS)
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
Description of System:	<p>UFS provides a unified and automated process to track the user fees collected by APHIS-VS sites across the nation. The UFS processes standard billing and fee information for 87 remote offices and the National Veterinarian Services Laboratory (NVSL) in Ames, IA. UFS subsequently provides the billing information to the Marketing & Regulatory Programs Business Services (MRPBS) in Minneapolis, MN and the Office of the Chief Financial Officer—National Finance Center (OCFO-NFC) in New Orleans, LA.</p> <p>UFS is currently operational and has been used in production since 1993. This system is a “Major Application” with a FIPS-199 classification of “Moderate”. The UFS resides on the APHIS Enterprise Infrastructure (AEI) General Support System (GSS) and consists of three databases and four instances of the UFS web application. The UFS National Database, West Region Database, and two instances of the web application reside in the Fort Collins, CO data center. The East Region Database and two remaining instances of the web application reside in the Riverdale, MD data center. The databases are Oracle 11g and run on Red Hat Linux servers. The instances of the web application run under the Oracle Application Server 10 on Windows 2003 servers.</p> <p>The UFS has interconnections to the Laboratory Information Management System (LIMS) and Veterinary Diagnostics Information System (VDIS) at the NVSL; and an interconnection to the Foundation Financial Information System (FFIS) at the NFC.</p>
Who owns this system? (Name, agency, contact information)	John Picanso USDA-APHIS-VS-OCIO 4700 River Road Riverdale, MD 20737-1228 (301) 734-3579 John.Picanso@aphis.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Elinor Z. Gallelli USDA-APHIS-VS-OCIO 2150 Centre Avenue, Bldg B, Mail Stop 2W4 Fort Collins, CO 80526 (970) 494-7333 Elinor.Z.Gallelli@aphis.usda.gov
Who completed this document? (Name, agency, contact information)	Newberry Group 1539 Old Hwy. 94 South St. Charles, MO 63303 (636) 928-9944



2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	The system collects information from citizens that include name, taxpayer ID, contact information, business information and financial data for the purpose of collecting user fees for services provided by Veterinary Services. For example, fees are collected when importing/exporting animals or plants.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	9CFR 130.2 User Fees
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 is input into the UFS via an electronic or manual APHIS-81. A customer may also open an account by completing an APHIS-192 and sending it to Minneapolis where it is input into UFS after being approved by the NFC.
4.1	What data is being collected from the customer?	Name, address, phone numbers, fees, payments, business information.
4.2	What USDA agencies are providing data for use in the system?	APHIS
4.3	What state and local agencies are providing data for use in the system?	None
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.



No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Customers request an APHIS credit account application (APHIS-192) 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.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Account Holder/Rate Information Updates are completed automatically to the regional databases from the national database.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	NA

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 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 nonpayment history). It also includes the type(s) of services provided by VS.
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 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 type="checkbox"/> No



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No.	Question	Response
9.3	How will the new data be verified for relevance and accuracy?	
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?	<p>In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, records maintained in the system may be disclosed outside USDA as follows:</p> <p>(1) To State animal health officials and State veterinary examining or licensing boards to certify accreditation status or exchange information regarding disciplinary action(s);</p> <p>(2) To the public for the purpose of locating and contacting accredited veterinarians in a specific geographical area, with access limited to business name, address, and telephone number for the business;</p> <p>(3) To the appropriate agency, whether Federal, State, local, or foreign, charged with responsibility of investigating or prosecuting a violation of law or of enforcing, implementing, or complying with 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 either arising by general statute or particular program statute, or by rule, regulation, or court order issued pursuant thereto;</p> <p>(4) To the Department of Justice 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, in litigation, 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 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;</p> <p>(5) For use 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</p>



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No.	Question	Response
		<p>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;</p> <p>(6) To appropriate agencies, entities, and persons when the agency suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised; the agency has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, a risk of identity theft or fraud, or a risk of harm to the security or integrity of this system or other systems or programs (whether maintained by the agency or another agency or entity) that rely upon the compromised information; and the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm;</p> <p>(7) To contractors and other parties engaged to assist in administering the program. Such contractors and other parties will be bound by the nondisclosure provisions of the Privacy Act. This routine use assists the agency in carrying out the program, and thus is compatible with the purpose for which the records are created and maintained;</p> <p>(8) To USDA contractors, partner agency employees or contractors, or private industry employed to identify patterns, trends or anomalies indicative of fraud, waste, or abuse; and</p> <p>(9) To the National Archives and Records Administration or to the General Services Administration for records management inspections conducted under 44 U.S.C. 2904 and 2906.</p>
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?	
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.



No.	Question	Response
12.1	What controls are in place to protect the data and prevent unauthorized access?	User Fee data from each of the VS 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 60days and are required to meet password complexity requirements.
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No -- If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

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?	Paper = 6 years, 3 months Electronic in system = 7 years Electronic in archive = Indefinite
14.2	What are the procedures for purging the data at the end of the retention period?	Paper records are destroyed at the end of the retention period.
14.3	Where are these procedures documented?	USDA DR3080-001
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?	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.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No -- If NO, go to question 18.
17.1	How will the data be used by the other agency?	



No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	<input checked="" type="checkbox"/> Yes <input 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?	Information in the UFS is transmitted to the USDA National Finance Center (NFC). There is an Interconnection Security Agreement (ISA) in place to ensure the PII/Privacy Act data is protected.
19	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input 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?	The data resides in regional databases located at Fort Collins, CO and Riverdale, MD. Many APHIS remote offices utilize the application to track billing for services and products. All of these sites access the data from one of the two regional servers which allows for consistent use of the system and data.

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.)?	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.
21	How will user access to the data be determined?	All requests to establish new accounts or modify the privileges of existing accounts are approved by the user's supervisor and the UFS System Owner or designee.
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?	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.
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.)?	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 required to change their passwords every 60 days and password complexity requirements are enforced. System monitoring capabilities are provided by the APHIS GSS. The system developer has not identified any threats to privacy as a result of the owner's requirements. All privacy risks have been identified in the Risk Assessment.
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	All inquiries should be addressed to the Freedom of Information and Privacy Act Staff, Legislative and Public Affairs, APHIS, 4700 River Road Unit 50, 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"> ▪ 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)?	<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?	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.
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.)?	Data can be queried by APHIS account number, NFC ID, customer name or address.
30.2	Under which Systems of Record (SOR) notice 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) (November 16, 2001). It also operates under Routine Use #1 of the USDA/OCFO-3 Billings and Collections Systems SORN (September 10, 1997). SORN is being updated and this activity is being tracked under POA&M 10482 in CSAM.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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?	

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.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.



Privacy Impact Assessment Authorization

Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Veterinary Services – User Fee System

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.

William Gross
Project Manager

Date

Tonya Woods
VS-Chief FOIA Officer

Date

John Picanso
VS-Chief Information Officer

Date

Ja'Nelle Devore
Agency ISSPM

Date

Marilyn Holland
APHIS Chief Information Office

Date