



# **Privacy Impact Assessment**

## **Veterinary Services Process Streamlining (VSPS)**

*Animal and Plant Health Inspection Service (APHIS)*

*Veterinary Services (VS)*

**Plan Effective Date: December 2009**

**Revision: 2.01**



## Document Information

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| Revision History |               |                     |                            |
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| Revision         | Date          | Author              | Comments                   |
| 1.0              | November 2005 | Veterinary Services | Initial Draft              |
| 2.0              | October 2009  | OSS                 | Conversion to new template |
| 2.01             | December 2009 | OSS                 | Updated Draft              |

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## Table of Contents

|     |                               |    |
|-----|-------------------------------|----|
|     | DOCUMENT INFORMATION.....     | II |
|     | TABLE OF CONTENTS.....        | IV |
| 1   | SYSTEM INFORMATION.....       | 1  |
| 2   | DATA INFORMATION.....         | 2  |
| 2.1 | Data Collection .....         | 2  |
| 2.2 | Data Use .....                | 4  |
| 2.3 | Data Retention .....          | 7  |
| 2.4 | Data Sharing.....             | 8  |
| 2.5 | Data Access .....             | 9  |
| 2.6 | Customer Protection .....     | 10 |
| 3   | SYSTEM OF RECORD.....         | 11 |
| 4   | TECHNOLOGY .....              | 12 |
| 5   | COMPLETION INSTRUCTIONS ..... | 13 |



# 1 System Information

| System Information   |   |
|--|---|
| Agency:  | Animal and Plant Health Inspection Service (APHIS)<br>Veterinary Services (VS)  |
| System Name:   | Veterinary Services Process Streamlining (VSPS)   |
| System Type:   | <input checked="" type="checkbox"/> Major Application<br><input type="checkbox"/> General Support System<br><input type="checkbox"/> Non-major Application  |
| System Categorization (per FIPS 199):  | <input type="checkbox"/> High<br><input checked="" type="checkbox"/> Moderate<br><input type="checkbox"/> Low   |
| Description of System:   | <p>The Veterinary Services Process Streamlining (VSPS) system has been classified as a major application by USDA/APHIS/VS. VSPS is being developed using a Rapid Application Development approach with phased releases of modules and functionality. Modules are rolled-out for user testing and acceptance as they are completed. The following provides the status and timeframes for each module that is currently within the scope of the VSPS project.</p> <p>VSPS currently consists of six major subsystems. The Core component provides user maintenance and system administration functions. The other five components represent the mission areas that contain the primary functions required to capture the information needed to track animal and animal product movement into, out of, and within the United States. Each mission area component includes forms that must be automated into a cohesive system so that information can be captured in a timely and accurate manner.</p> |
| Who owns this system?<br>(Name, agency, contact information)                     | Dr. Joseph VanTiem, Senior Staff Veterinarian, Surveillance and Identification Programs<br>APHIS<br>Phone: 301-734-3222<br><a href="mailto:Joseph.S.VanTiem@aphis.usda.gov">Joseph.S.VanTiem@aphis.usda.gov</a>   |
| Who is the security contact for this system? (Name, agency, contact information) | Elinor Z. Gallelli<br>VS Information Systems Security Manager<br>USDA/APHIS/VS<br>Office of the VS CIO<br>2150 Centre Avenue, Bldg B, Mail Stop 2W4<br>Fort Collins, CO 80526<br>Phone: 970-494-7333<br>Cell: 970-215-8572<br>Fax: 970-494-7294<br><a href="mailto:Elinor.Z.Gallelli@aphis.usda.gov">Elinor.Z.Gallelli@aphis.usda.gov</a>   |
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## 2 Data Information

### 2.1 Data Collection

| No. | Question  | Response  |
|-----|---|---|
| 1   | Generally describe the data to be used in the system.   | The VSPS system collects information from veterinarians that apply on-line to become federally accredited, from importer that are requesting a permit to import animals, and from accredited veterinarians that are submitting health certificates for the export and interstate movement of animals. VS personnel processes and approve applications for federal accreditation, document actions taken against accredited veterinarians, process permit requests and issue import permits, maintain the animal import rules, process export health certificates, and maintain the export protocols. State personnel issue permits for interstate movement requests and maintain the state protocols. |
| 2   | Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?   | <input type="checkbox"/> Yes<br><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<br><input type="checkbox"/> No  |
| 4   | Sources of the data in the system.  | The primary sources of information collected and stored in the VSPS system are data entered by importers for import permit requests and accredited veterinarians for accreditation applications, export health certificates, and interstate movement health certificates  |

| No. | Question  | Response   |
|-----|---|--|
| 4.1 | What data is being collected from the customer?                         | <p>The Accredited Veterinarians provide personal and professional information to apply on-line to become federally accredited. Importers provide address and contact information for the consignee, consigner, shipper, and destination for permits to import animals along with detailed animal information. The Accredited Veterinarians provide address and contact information for the consignee, consigner, shipper, and origin for health certificates to export animals along with detailed animal information. The Accredited Veterinarians provide address and contact information for the consignee, consigner, shipper, destination, and origin for interstate movement health certificates along with detailed animal information. VS personnel provide information needed to complete the processing and approval of applications for federal accreditation. In addition, VS personnel provide information on actions taken against accredited veterinarians.</p> |
| 4.2 | What USDA agencies are providing data for use in the system?            | <p>The USDA Premises Allocator database is accessed by the VSPS system via published APIs to obtain the Premises ID for Origin and Destination locations. For import permit requests, the Premises ID is obtained for the final destination location. For export health certificates, the Premises ID is obtained for the origin location. For interstate movement health certificates, the Premises ID is obtained for both the origin and destination location.</p> <p>The USDA eAuthentication system is accessed when users log on to the VSPS system to verify the user is authorized to access the system. The relationship between the user's eAuthentication account and the VSPS user account are maintained in the VSPS database.</p>  |
| 4.3 | What state and local agencies are providing data for use in the system? | <p>The State Agencies supported by the VSPS system consist of State Animal Health Officials (SAHO) in each state, who participate in the Veterinary Accreditation process and manage the interstate movements of animals. The interstate movement protocols, which define the requirements that must be satisfied prior to animals entering the state, are managed and maintained in the VSPS system by the SAHO for their respective state. These protocols are applied when Accredited Veterinarians create interstate movement requests.</p>  |
| 4.4 | From what other third party sources is data being collected?            | None   |

| No. | Question   | Response   |
|-----|--|--|
| 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<br><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?                            | All data collected and stored in the VSPS system is provided by either a customer (importer, SAHO, and Accredited Veterinarian) or VS personnel.                                 |
| 5.2 | How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?                         | Extensive edits are employed in the VSPS system when data is entered by importers, SAHO, VS personnel, and accredited veterinarians to ensure completeness and accuracy of data. |
| 5.3 | How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?                     | Extensive edits are employed in the VSPS system when data is entered by importers, SAHO, VS personnel, and accredited veterinarians to ensure completeness and accuracy of data. |

## 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 will be used to support Veterinary Accreditation, Import of Animals, Export of Animals, Interstate Movement of Animals, and Slaughter Horse Transport, all of which are covered under the Code of Federal Regulations (CFR) 9 Animals and Animal Products. The data collected within VSPS will also be used for research, investigative and litigation support, comparative and risk analysis. |
| 7   | Will the data be used for any other purpose?   | <input type="checkbox"/> Yes<br><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<br><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<br><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<br><input type="checkbox"/> No   |



| No. | Question  | Response  |
|-----|---|---|
| 9.2 | Can the system make determinations about customers or employees that would not be possible without the new data?  | <input type="checkbox"/> Yes<br><input type="checkbox"/> No   |
| 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>The data will be used to support Veterinary Accreditation, Import of Animals, Export of Animals, Interstate Movement of Animals, and Slaughter Horse Transport, all of which are cover under the Code of Federal Regulations (CFR) 9 Animals and Animal Products. The data collected within VSPS will also be used for research, investigative and litigation support, comparative and risk analysis.</p> <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</p> |

| No. | Question | Response   |
|-----|----------|--|
|     |          | <p>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 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</p> |

| No.  | Question  | Response  |
|------|---|---|
|      |   | Administration or to the General Services Administration for records management inspections conducted under 44 U.S.C. 2904 and 2906.  |
| 11   | Will the data be used for any other uses (routine or otherwise)?  | <input type="checkbox"/> Yes<br><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<br><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?   | The VSPS application will be hosted in the USDA Fort Collins Data Center which is a secure environment protected by the appropriate firewalls and IT infrastructure, application controls, and internal controls. |
| 13   | Are processes being consolidated?   | <input type="checkbox"/> Yes<br><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<br><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? | The retention period for data associated with accredited veterinarians will be forever. The retention period for data associated with the import of animals, export of animals, interstate movement, and slaughter horse transport is planned to be 7 years. |
| 14.2 | What are the procedures for purging the data at the end of the retention period?                | Data is purged at the end of the retention period in accordance with the procedures provided in USDA Directive 3080-001 Appendix B.  |
| 14.3 | Where are these procedures documented?  | The documentation for these procedures can be found at:<br><a href="http://www.ocio.usda.gov/directives/doc/DR3080-001.pdf">http://www.ocio.usda.gov/directives/doc/DR3080-001.pdf</a>   |

| No. | Question  | Response   |
|-----|---|--|
| 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? | <p>The data associated with an accredited veterinarian is maintained by the customer (user) that provided the original information. These users have fully access to the data that pertains to them, so the accuracy of the data is controlled by the customer and owner of the data. In addition, these users will be prompted by the VSPS system to verify and update their data every 6 months to ensure the data remains current and accurate.</p> <p>The data associated with imports, exports, interstate movement, and slaughter horse transport are transactional in nature. Once a request is processed to completion, which should take no longer than 90 days, the data is retained as read only and will not be changed. The timeliness, accuracy, and completeness of this data will not be an issue.</p> |
| 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<br><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<br><input type="checkbox"/> No – If NO, go to question 18.  |
| 17.1 | How will the data be used by the other agency?   | The State Animal Health Officials in each state will have user accounts that allow them to view the data contained in the VSPS system. Access to the data will be limited to information that pertains to their assigned state. At this point, no other Federal or International agencies have been identified as requiring access to the data contained in VSPS. |
| 17.2 | Who is responsible for assuring the other agency properly uses the data?   | USDA APHIS, including the VS Management Team, Regional Directors, Area Veterinarian in Charge (AVIC) and Support Staff, State Veterinarians, and the applicable program staff are all responsible for protecting all PII data identified in the VSPS as required by applicable State and Federal laws   |
| 18   | Is the data transmitted to another agency or an independent site?  | <input type="checkbox"/> Yes<br><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.  | Question   | Response   |
|------|--|--|
| 19   | Is the system operated in more than one site?                              | <input checked="" type="checkbox"/> Yes<br><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 collected and maintained by VSPS will be kept in a single database, which all users will access. This ensures that a single view of the data is provided to all system users. |

## 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.)? | <p>The VSPS system supports 13 different types of users, in two user categories. The categories are</p> <ul style="list-style-type: none"> <li>• VS users, who are Federal Government employees working within Veterinary Services</li> <li>• Non-VS users, which include non-Government employees, such as veterinarians, importers, and laboratory technicians.</li> </ul>   |
| 21  | How will user access to the data be determined?  | <p>Access to the data within the VSPS system is controlled through the use of role based access permissions and internal business logic.</p> <p>In addition, users logged in with a role Importer and Accredited Veterinarian will only be able to access data that was created under their user ID and will not be able to access data created by other users. User logged in with a role of State Veterinarian will have minimal update capabilities for data that is associated with their state and read only access for all other states. The AVIC Office role will be able to update data associated with their assigned state and will have read only access to data associated with other states. The Port Officer role will have access to only the data that is associated with the port to which they are assigned. The Vet Accreditation HQ role will have full access to the data for all states that is associated with veterinary accreditation. The National – Full Access role will have full access to the data for all states and ports that is associated with imports and exports. The National – View Only role will have read only access to the data for all states and ports that is associated with imports and exports. The System Administrator will have full access to all data contained in the system.</p> |

| No.  | Question  | Response  |
|------|---|---|
| 21.1 | Are criteria, procedures, controls, and responsibilities regarding user access documented?  | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No  |
| 22   | How will user access to the data be restricted?   | Access to the data within the VSPS system is controlled through the use of role based access permissions and internal business logic. |
| 22.1 | Are procedures in place to detect or deter browsing or unauthorized user access?  | <input checked="" type="checkbox"/> Yes<br><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<br><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, Regional Directors, Area Veterinarian in Charge (AVIC) and Support Staff, State Veterinarians, and the applicable program staff are all responsible for protecting all PII data identified in the VSPS as required by applicable State and Federal laws   |
| 25  | How can customers and employees contact the office or person responsible for protecting their privacy rights?   | Any individual customer or employee may obtain information from a record in the system that pertains to him or her. Requests for hard copies of records should be in writing, and the request must contain the requesting individual's name, address, name of the system of records, timeframe for the records in question, any other pertinent information to help identify the file, and a copy of his/her photo identification containing a current address for verification of identification. 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.<br><input type="checkbox"/> No   |

| No.  | Question  | Response   |
|------|---|--|
| 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<br><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?  | VS personnel process Accreditation Applications, export health certificates, and import permits that are submitted by veterinarians and importers. These individuals could be treated unfairly if VS personnel show preferential treatment to some individuals and/or delay the processing their requests. VS personnel should process requests in the order they are received to prevent any special or preferential treatment. |
| 29   | Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?   | <input type="checkbox"/> Yes<br><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<br><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.)?  | Access to the data within the VSPS system is controlled through the use of role based access permissions and internal business logic.   |
| 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> .)                         | <ul style="list-style-type: none"> <li>• USDA/APHIS-1, Investigative and Enforcement Records Regarding Regulatory Activities;</li> <li>• USDA/APHIS-2, Veterinary Services – Records of Accredited Veterinarians; and</li> <li>• USDA/APHIS-8, Veterinary Services – Animal Welfare.</li> </ul> |

| No.  | Question   | Response   |
|------|--|--|
| 30.3 | If the system is being modified, will the SOR require amendment or revision? | <input checked="" type="checkbox"/> Yes<br><input 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<br><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

\_\_\_\_\_  
(VSPS 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.

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

\_\_\_\_\_  
Date

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Agency ISSPM/CISO

\_\_\_\_\_  
Date

\_\_\_\_\_  
Agency OCIO

\_\_\_\_\_  
Date