

# Privacy Impact Assessment Animal Care Information System (ACIS)

Technology, Planning, Architecture, & E-Government

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# **Privacy Impact Assessment for the Animal Care Information System (ACIS)**

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Animal and Plant Health Inspection Service (APHIS)**

## Abstract

System Name	Animal Care Information System (ACIS)
System Description	ACIS is used by AC staff in Headquarters, Regional offices and field inspectors for inspections, data collection, data analysis, data management, monitoring and reporting to ensure compliance with Animal Welfare Act (AWA) and Horse Protection Act (HPA).
Reason for PIA	Based on the ACIS Privacy Threshold Analysis (PTA), a full Privacy Impact Assessment is required.

## Overview

Agency	Animal and Plant Health Inspection Service (APHIS), Animal Care (AC)
System Name	Animal Care Information System (ACIS)
System Owner	Dr. Chester Gipson Deputy Administrator, Animal Care (301) 734-4980 Chester.A.Gipson@.aphis.usda.gov
Purpose of the system	The purpose of the system is to provide a standard approach to collect, record, analyze, maintain, and report information to cooperating and regulatory entities.
General Description	The system is used by Animal Care organization to conduct inspections in accordance with the Animal Welfare Act (AWA), allows Horse Industry Organizations (HIOs) to electronically complete the reporting requirements for the Horse Protection Act (HPA) with data gathered from horse shows around the country and serves as a repository for various management reports and business process documentation.
Description of Typical Transaction Conducted	ACIS collects and manages customer data for license, registration, and facility research which are part of the Animal Care collection. AC field inspectors can access the customer's address, site address, inspections conducted in the last 3 years, animal inventory, and contact phone numbers of the facilities being inspected. It provides AC personnel with the capability to enter and retrieve licensing and registration data from approximately 120 field inspector locations throughout the United States.
Information Sharing	ACIS also serves as a central point for Animal Care management system support and content management whereby AC business processes documentation and standard operational procedures can be shared internally. There are no interconnections or information sharing with



	<p>other system.</p>
<p>Description of the ACIS subsystems</p>	<p>ACIS Subsystems are depicted in a diagram below:</p> <p>The diagram illustrates the ACIS Subsystems architecture. It shows the Internet connected to an eAuthentication service, which provides access to four main subsystems: Animal Welfare Act (AWA), Horse Protection Act (HPA), Management Support System (MSS), and AC Content Management System. The AWA subsystem includes functions like Customer Information, License &amp; Registration, Research Facilities, Annual Report, Complaints, Online Inspection, Inspection activities map, Search engine, FOIA, Animal Inspection, Rule Draft/Amend, Online License, and Registration Filter, and Reports. The HPA subsystem includes Horse Industry Organization, Horse Show, Designated Qualified Person, Veterinarian Medical Office, Ticket and Fine, and Ticket Suspension, and Reports. The MSS subsystem includes ACIS Reports and Ads Info, Weekly Activity Management, Budget Management, Schedule/Calendar, Plans Management, Performance Management, Asset Management, Documents Management, Travel Management, and Projects and Issues Management, and Reports. The AC Content Management System includes the Communications Forum and AC Website. The Communications Forum includes Animal Welfare, Horse Protection, Emergency Programs, Center for Animal Welfare, AC SOP, AC Updates, AC eNews, AC Compendia, and Industry Forums. The AC Website includes Animal Welfare, Horse Protection, Emergency Programs, Center for Animal Welfare, Latest News, Publications/Reports, FOIA, ACIS Search, and Meetings/Liaison.</p> <p>ACIS application components include the Oracle 10g server and the laptops that host the Oracle Personal application expressly for the purpose of using the ACIS application. All software and hardware used by ACIS are government owned products. The software is Off-the-Shelf Commercial Software (COTS) that was purchase to support ACIS development and implementation on both servers and clients.</p> <p>The ACIS database is designed to support the AWA, the HPA, MSS, and AC-CMS.</p> <ol style="list-style-type: none"> <li>1. The AWA portion contains information on individuals with certificates and others that have applied for certification under the AWA. AWA inspection reports are generated by the database with data that is entered in to ACIS by field personnel during onsite inspections.</li> <li>2. The HPA portion contains information on Horse Industry Organizations (HIO) certified under the HPA and its Designated Qualified Persons (DQP) to inspect horses for violations of the HPA and data on these violations. The ACIS</li> </ol>

	<p>information flow for online and offline application can be found in ACIS Application Design document.</p> <p>3. MSS is a reporting module used by the ACMT and AC staffs members that need the information for planning and management purposes that are vital to measuring work performance, operations, spending, resource allocation and distribution, and others. The MSS includes the following subsystems: (1) ACIS Reports and Add Hoc; (2) Weekly Activity Management; (3) Budget Management; (4) Strategic/Operating Plans Management ; (5) Performance Management; (6) Asset Management; (7) Documents Management; (8) Travel Management; (9) Projects and Issues Management.</p> <p>4. AC-CMS provides a central point for information sharing whereby ACIS business processes, standard operational procedures, and data can be shared internally among AC staffs in Headquarters, Regional and field offices. The information presents to AC staffs is in the form of report generation or read only screen display. The reports consist of information related to Animal Welfare Act, Horse Protection Act, Animal Welfare Regulations, Standards, Policies, and Guidelines.</p>
<p>Legal Authority to Operate the system</p>	<p>ACIS has an Authority to Operate (ATO) letter dated 08/16/2011 and is categorized as a "Moderate" system.</p>

## Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

### 1.1 What information is collected, used, disseminated, or maintained in the system?

- Customer - contact, license and registration, activity, site location, finance, certificate, and request information
- Inspection - animal inventory, violation, and citation of AWA and HPA.



- Horse Industry Organization - name, address of the horse organization.

## **1.2 What are the sources of the information in the system?**

ACIS contains information on licensees, registrants and others who have stated an interest in or applied for a license or registration, information on Horse Industry Organizations (HIOs) and violations.

## **1.3 Why is the information being collected, used, disseminated, or maintained?**

Anyone who applies for the registration license must provide the information per the AWA and HPA regulations.

## **1.4 How is the information collected?**

Animal Care inspectors, field office staff and customer provide the information via ACIS data entry fields.

## **1.5 How will the information be checked for accuracy?**

Information are checked for accuracy through data entry validation, audit reports and review by Legal Public Affairs (LPA) officials prior to release to public. Additionally, on routine field inspections and audits spot checks are done to validate the accuracy of records in the database.

## **1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?**

Animal Welfare Act (AWA) and the Horse Protection Act mandated by Congress require the collection of information to ensure compliance with the regulations.

## **1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

ACIS contains information on licensees, registrants and others who have stated an interest in or applied for a license or registration, information on Horse Industry Organizations (HIOs) and violations. The information resides in the database system that is protected by the APHIS firewalls. The availability of information the user has access to within ACIS depends on the role the user has within the system. The system employs access restriction to users who can enter, view, update or delete the information. To access the ACIS system, a user must first login to their laptop through McAfee Endpoint Encryption and, then establishes VPN connection to access

APHIS network. Once that has been completed users connect to ACIS application via USDA eAuthentication by providing User ID and password. Furthermore, sensitive data such as social security number or tax identification number stored in the database are encrypted at rest and in transit.

## Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

### 2.1 Describe all the uses of information.

ACIS allows AC field inspectors to have direct access to the Oracle database and have immediate availability on the current status of any Animal Welfare regulated facility in the United States. ACIS provides AC users with the capability to enter and retrieve licensing and registration data from approximately 120 field inspector locations throughout the United States.

### 2.2 What types of tools are used to analyze data and what type of data may be produced?

ACIS utilizes the JAVA/J2EE/Struts framework for the web presentation driven by user roles and using a single interface for both field inspections and other authorized users. Oracle Application Express (APEX) is used to analyze data. The data are produced in the form of PDF file, Excel spreadsheet and text file for various types of reports such as Inspection reports, Research Facility Annual Report, Complaints, Horse Industry Organization, Designated Qualified Persons (DQPs) and Horse Protection Program Report.

### 2.3 If the system uses commercial or publicly available data please explain why and how it is used.

ACIS does not use commercial or publicly available data.

### 2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

ACIS has the following security controls to ensure that PII information is handled in accordance with the above described uses:

- Access to the application must be authenticated via USDA eAuthentication requiring user ID and password.



- Privileges and permissions assigned to enter, view, update, modify or delete the information given to individual user account are based on their job's roles and responsibilities.
- Sensitive data such as social security number or tax identification number are encrypted at rest and in transit.

## Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

### 3.1 How long is information retained?

The retention period of data in ACIS is three years.

### 3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

Yes.

### 3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Data are maintained and disposed of in accordance with APHIS records retention schedules, access control procedures and APHIS Directive 3440.2 which outlines the appropriate procedures for disposing of media and data on media in a manner that makes it impossible to recover.

## Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

### 4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

The information from ACIS is shared with the APHIS Investigative and Enforcement Services (IES) with regards to legal actions for breaking the AWA regulations.

### 4.2 How is the information transmitted or disclosed?

Animal Care transmits/disclose PDF or read only web display to APHIS programs.



**4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.**

There is an inherent risk associated with the sharing of privacy data internally. However, APHIS internal staff whose responsibilities involved the handling of privacy data is required to undergo privacy awareness training.

## **Section 5.0 External Sharing and Disclosure**

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

**5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?**

Horse Industry Organizations (HIO) for the purpose of information sharing in cases of Horse Protection Act (HPA) violations and violators; the public for the purpose of read-only display of information on violations and violators of the HPA and/or AWA.

**5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.**

Animal Care does not share PII information outside the Department.

**5.3 How is the information shared outside the Department and what security measures safeguard its transmission?**

Information is shared via read-only PDF document and/or read-only web browser display.

**5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.**

Animal Care does not share PII information externally. Thus, there is minimal exposure to privacy risk that could impact Animal Care organization.

## Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

### 6.1 Was notice provided to the individual prior to collection of information?

Yes. Information is collected on approved APHIS forms, which contain Privacy Act Statements.

### 6.2 Do individuals have the opportunity and/or right to decline to provide information?

Individuals who are subject to be in compliance with the AWA and HPA regulations are required to provide the requested information.

### 6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

Yes. Individual exercises his right via APHIS Animal Care, APHIS Legislative Public Affairs (LPA), and Department of Justice.

### 6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

The System of Record Notice USDA/APHIS 8 is the official notice. No information is collected without an individual's awareness. At the time of data collection, a form is being completed or the individual is speaking with a Federal or State employee. The information being collected is not of an extremely sensitive or personal nature.

## Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

### 7.1 What are the procedures that allow individuals to gain access to their information?

Any individual 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.

**7.2 What are the procedures for correcting inaccurate or erroneous information?**

Inaccurate or erroneous information is corrected by Animal Care inspector with the approval of their manager in order for corrections to be made.

**7.3 How are individuals notified of the procedures for correcting their information?**

Individuals are notified of procedures for correcting their information via postal mail by Animal Care.

**7.4 If no formal redress is provided, what alternatives are available to the individual?**

Any individual may contest information contained within a record in the system that pertains to him/her by submitting a written request to the system manager to the Freedom of Information and Privacy Act Staff, Legislative and Public Affairs, APHIS, 4700 River Road Unit 50, Riverdale, MD 20737-1232. Include the reason for contesting the record and the proposed amendment to the information with supporting documentation to show how the record is inaccurate.

**7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.**

Any data used or furnished documented above would need to be cleared through the Freedom of Information Act process. Data are all submitted voluntarily by customers who seek out government services from the USDA or as part of an animal care inspection.

## **Section 8.0 Technical Access and Security**

The following questions are intended to describe technical safeguards and security measures.

**8.1 What procedures are in place to determine which users may access the system and are they documented?**

Access to ACIS is based on the need to conduct business with Animal Care. Access must be requested in writing and approved by Animal Care CIO.

**8.2 Will Department contractors have access to the system?**

No Department contractors have access to ACIS.

**8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?**

All USDA/APHIS employees provided access to the ACIS are required to complete annual Information Technology (IT) Security Awareness Training and must sign APHIS Rules of Behavior form prior to receiving access to the information system.

All non-APHIS users (customers) are required to read the eAuth login screen before they login to input data into ACIS.

**8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?**

Yes

**8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?**

Auditing is enabled within the application for defined auditable events including data uploads, modification to ACIS schema objects, administrative access, unsuccessful and unauthorized access. Audit monitoring, analysis and reporting are reviewed weekly by AC Information System Security Manager (ISSM).

**8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

There is a risk that personal information collected on individuals may be distributed beyond the intended audiences. ACIS has access controls in place to ensure that only individuals with a valid need-to-know/need-to-share have access to the information in the database.



## Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

### 9.1 What type of project is the program or system?

The project is a “web-enabled” application allowing USDA personnel, as well as external users with limited privileges, to access the application through either an intra- or extranet.

### 9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

No

## Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

### 10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?

Yes

### 10.2 What is the specific purpose of the agency’s use of 3<sup>rd</sup> party websites and/or applications?

ACIS does not use 3<sup>rd</sup> party websites and/or applications.

### 10.3 What personally identifiable information (PII) will become available through the agency’s use of 3<sup>rd</sup> party websites and/or applications.

ACIS does not use 3<sup>rd</sup> party websites and/or applications.

### 10.4 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be used?

ACIS does not use 3<sup>rd</sup> party websites and/or applications.

**10.5 How will the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications be maintained and secured?**

ACIS does not use 3<sup>rd</sup> party websites and/or applications.

**10.6 Is the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications purged periodically?**

ACIS does not use 3<sup>rd</sup> party websites and/or applications.

**10.7 Who will have access to PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications?**

ACIS does not use 3<sup>rd</sup> party websites and/or applications.

**10.8 With whom will the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications be shared - either internally or externally?**

ACIS does not use 3<sup>rd</sup> party websites and/or applications.

**10.9 Will the activities involving the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

ACIS does not use 3<sup>rd</sup> party websites and/or applications.

**10.10 Does the system use web measurement and customization technology?**

No

**10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?**

No

**10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3<sup>rd</sup> party websites**



**and/or applications, discuss the privacy risks identified and how they were mitigated.**

N/A, ACIS does not use 3<sup>rd</sup> party websites or applications.

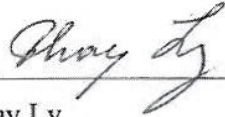
## **Responsible Officials**

Tola Liv, APHIS – AC ISSM

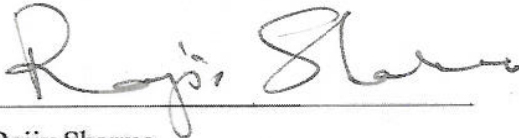
Thay Ly, APHIS – AC CIO

United States Department of Agriculture

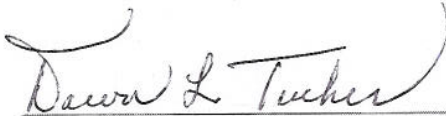
## Approval Signature



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