



# **Privacy Impact Assessment**

## **EMERGENCY QUALIFICATION SYSTEM (EQS)**

*Revision: APHIS Final*

*United States Department of Agriculture  
(USDA) – Animal and Plant Health Inspection  
Service (APHIS)*

*Date: September 29, 2009*



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Name	Title	Agency/Office	Contact Information

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Date Sent	Date Approved	Approver	Title
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# 1 System Information

**Table 1 – System Information**

System Information	
Agency:	United States Department of Agriculture (USDA)
System Name:	Animal Plant Health Inspection Service (APHIS) Emergency Qualification System (EQS)
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:	APHIS EQS is the record keeping system used to store the skills, qualifications and contact information of response personnel. EQS promotes timely and effective responses to and management of plant and animal health or all hazard incidents by automating the collection, management, and analysis of responder data.
Who owns this system? (Name, agency, contact information)	Name: Robert Green Title: Director, EMSSD Agency: USDA APHIS Address: 4700 River Road, Riverdale, MD 20737 Phone Number: 301-436-3153 E-mail Address: Robert.D.Green@aphis.usa.gov
Who is the security contact for this system? (Name, agency, contact information)	Name: Michael Fuchs Title: Information System Security Manager (ISSM) Agency: USDA APHIS Address: 4700 River Road, Riverdale, MD 20737 Phone Number: 301-851-2527 E-mail Address: Michael.Fuchs@aphis.usda.gov
Who completed this document? (Name, agency, contact information)	Name: SeNet International Title: Information Assurance Analyst Agency: SeNet International Address: 4030 Williams Drive, Suite 510, Fairfax, VA 22031 Phone Number: 703-206-9383 E-mail Address: <a href="http://www.senet-int.com">http://www.senet-int.com</a>

## 2 Data Information

### 2.1 Data Collection

Table 2 – Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	EQS is an emergency management application that stores the skills and qualifications about emergency response personnel. Responders may be APHIS employees, NAHERC Volunteers, or ESF11 Partners
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. <i>Note: EQS uses SSN only as a primary key to move personnel data about APHIS responders into EQS to create and update responder profiles. An agent converts, encrypts and deletes this value from EQS when the create/update action is completed. SSN is not stored in EQS.</i>
2.1	State the law or regulation that requires the collection of this information.	<p>APHIS is an emergency response organization whose mission is to protect the health and value of U.S. agricultural, natural and other resources.</p> <p>Animal Health Protection Act (7 U.S.C. 8301 et seq.)</p> <p>The Plant Protection Act (Title IV. Pub. L. 106-224, 114 stat. 438.7 U.S.C. 7701-7772)</p> <p>The Department of Homeland Security (DHS) National Response Framework (NRF) identifies 15 Emergency Support Function (ESF) Annexes, each annex describing a subset of emergency response activities. The ESF #11 annex encompasses activities related to Agriculture and Natural Resources. The ESF #11 Annex involves four Federal agencies, including USDA APHIS, USDA Food and Nutrition Service (FNS), USDA Food Safety and Inspection Service (FSIS), and the Department of the Interior (DOI). USDA and DOI are designated as the primary federal departments in the ESF #11 Annex and USDA is designated as the lead department. HSO delegated the lead responsibility to APHIS. This delegation gives APHIS the responsibility to coordinate and serve as the liaison between DHS/FEMA, USDA, DOI, and cooperating state and local entities for preparedness and response to an activation of ESF #11.</p>



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No.	Question	Response
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.	EQS is populated with data from the National Finance Center (NFC) personnel system, USDA AgLearn, WebTA, USA Jobs, and the Resource Ordering and Status System (ROSS).

4.1	What data is being collected?	<p><b><i>EQS is a central repository for information from multiple official Systems of Record (SoR). This information is needed for incident response. Official SoR and applicable imported fields are identified in 1-5 below:</i></b></p> <p><b>1 – NFC Personnel System</b> Name, ssn, agency name, organizational code, duty city, duty state, duty station, grade, series, pay plan, official title, working title, appointment type, employment type, service computation date, and business code.</p> <p><b>2 – USDA AgLearn</b> AgLearn ID, item id, item name, completion date</p> <p><b>3 – WebTA</b> Name, supervisor name, supervisor organizational code, employee organizational code</p> <p><b>4 – USA Jobs</b> National Animal Health Emergency Responder Corporation (NAHERC) applicant ID, city, state, zip code, official title, email address</p> <p><b>5 – ROSS</b> Resource Ordering and Status System (ROSS) Resource ID, name, dispatch code, dispatch name, jet port, resource status, home unit code, incident ID, incident name, incident number, incident type, AgHealth position name, AgHealth position code, overhead request number, resource qualification status, mobilization ETA, demobilization ETA.</p>
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4.1	What data is being collected?	<p><i>Data related to medical clearances, personal protective equipment (PPE) and AgHealth position certifications can be manually entered into EQS or imported via an Excel spreadsheet.</i></p> <p><i>Direct entry for 6-9 below is limited to those holding specialized access roles within EQS.</i></p> <p><b>6 - Medical Clearance</b> Name, clearance status, clearance type, clearance requested by, scheduled exam date, exam completed date, approval date, clearance expiration date, type of clearance approved, clearance approved by, restrictions</p> <p><b>7 - PPE</b> Name, PPE status, type, size, model, special requirements, fit tester, fit test date, expiration date</p> <p><b>8 – Orientation &amp; Training</b> Name, course name/description, completion date</p> <p><b>9 – Position Certification</b> Name, certification status, AgHealth position name, certification type, date certified, certified by who</p> <p><i>Responders are asked to directly enter information critical for incident response, Continuity of Operations Planning (COOP) and emergency weather notification below.</i></p> <p><b>10 – Responder Profile</b> Government travel card (Y/N), Drivers license (Y/N), Supervisor status (Y/N), and notification method.</p> <p><b>11 – Responder Skills</b> Existing skills, desired skills</p>
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4.1	What data is being collected?	<p><b>12 – Responder Contact</b></p> <p>Home city, home state, home county, home country, home zip code, emergency contact name, emergency contact phone, emergency contact relationship, alternate emergency phone, work address, work city, work state, work zip, work phone, work county, work country, work latitude/longitude, work email address, work government cell phone/pager/BlackBerry, TDY address, TDY city, TDY state, TDY zip, TDY phone, TDY county, TDY country, TDY latitude/longitude, TDY email address, TDY government cell phone/pager/BlackBerry</p> <p><i>Dispatchers or EQS System Administrators may be required to create an emergency responder profile record manually. The fields required to create a profile are identified below.</i></p> <p><b>13 – Responder Profile</b></p> <p>Name, nickname, unique ID number, official title, organizational code, supervisor name, supervisor phone, supervisor email, jetport, grade, series,</p>
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4.2	What USDA agencies are providing data for use in the system?	Animal and Plant Health Information System (APHIS) and Emergency Support Function (ESF) 11 Partners (USDA Food and Nutrition Service (FNS) and the USDA Food Safety and Inspection Service (FSIS)).
4.3	What state and local agencies are providing data for use in the system?	None currently – However it is anticipated that State Department of Agriculture employees responding to APHIS incidents will be tracked through EQS and ROSS. This will necessitate the creation of an EQS profile for each State Department of Agriculture employee who responds. Personally identifiable information (PII) data is not collected from state or local agencies.
4.4	From what other third-party sources is data being collected?	NAHERC volunteers and ESF11 Department of Interior (DOI) responders. Information may also be collected from Customs and Border Protection employees should they be required to respond to an APHIS incident. Personally identifiable information (PII) data is not collected from third party sources.
5	Will data be collected from sources outside of 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?	No data is collected from customers. Data collected from non-USDA sources is addressed in 5.3





5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	<p>Data for APHIS responders is imported into EQS from official systems of record on a regularly scheduled basis (NFC, WebTA and AgLearn). Database administrators and those holding higher level roles within the application are responsible for performing routine data checks. Any data changes that are required are done in those official systems of record, not in EQS. When the official systems of record are updated, the updated information will show in EQS. After the certification and accreditation process is completed, each APHIS responder will be allowed view/read access to their EQS record. Any discrepancies will be reported to the EQS Program Manager or Assistant. All responders are asked to provide emergency contact information.</p> <p>Medical Clearance Officers, PPE Fit Testers, Certifying Officials, and Orientation and Training Officers verify and update responder information pertinent to their functions.</p>
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Authorized APHIS personnel who collect the data are responsible for the review and accuracy of the data.

## 2.2 Data Use

Table 3 – 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?	Information is used for emergency preparedness, planning and incident response; including the allocation of resources based on various skill sets. Development of response programs to be used for incident response.
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



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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 <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?	The data will be used to determine whether or not a responder is qualified and available to fill a requested position at an APHIS incident. Qualified means that they have the appropriate training, experience and skills needed at the incident site and is determined by an APHIS Certifying Official.
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.
12.1	What controls are in place to protect the data and prevent unauthorized access?	Users must go through a three-tier authentication process to access the EQS.
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>Data is secured in EQS through the use of user roles. Responders will have access to view only their own data. If responders find discrepancies with their data, they will report that to the EQS Program Manager.</p> <p>EQS maintains a robust audit-tracking tool, which identifies any field what was changed, when and by whom.</p>

## 2.3 Data Retention

Table 4 – Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 15. APHIS MRPBS EMSSD recognizes this as a deficiency in the EQS application and has established POA&M # 12406 in CSAM. The target date for remediation is March 1, 2010. EQS will establish procedures to archive and purge inactive responder data on a scheduled basis.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period??	
14.3	Where are these procedures documented?	
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?	APHIS responders will have access to view their data and maintain their emergency contact information. Data about other responders (NAHERC, ESF11 Partners, etc) will be validated by the Program Manager responsible for that program. The EQS Program Manager performs periodic spot-checks of the accuracy of the data.
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

Table 5 – 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)?	<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?	The EQS feeds responder qualification data to the ROSS. This application is owned by the U.S. Forest Service and resides on a secure server in Kansas City, MO. EQS also feeds responder qualification data to the Emergency Management Response System (EMRS).
17.2	Who is responsible for assuring the other agency properly uses the data?	ROSS system owner, U.S. Forest Service. EMRS system owner, APHIS Veterinary Services
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?	An interagency agreement is in place between EQS and ROSS.
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?	A replication server, EMRSXX resides at Fort Collins, CO; which coordinates the duplication of data between EMRSXX in Fort Collins, CO and EMRSXX in Riverdale, MD.

## 2.5 Data Access

**Table 6 – 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 responders will have access to their own data. APHIS personnel who have a need for a higher level of access will request that access from the EQS Program Manager. Non APHIS responders will not have direct access within EQS
21	How will user access to the data be determined?	Access will be granted on a role-based/need-to-know basis.
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?	Role-based access controls.
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

**Table 7 – 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.)?	The EQS System Administrators.
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	Customers can contact the Freedom of Information and Privacy Act Staff, Legislative and Public Affairs, APHIS, 4700 River Road Unite 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 type="checkbox"/> Yes – If YES, go to question 27. <input checked="" type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	APHIS MRPBS EMSSD recognizes this as a deficiency in the EQS application and has established POA&M # 12407 in CSAM. The target date for remediation is March 1, 2010



No.	Question	Response
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; and</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?	Access to EQS is role based. All responders will be provided access to EQS and given the role of "responder/user". Responders needing a higher level of access will request that access through the EQS Program Manager. Higher levels of access will be granted to responders commiserate with their role in the Agency. Identified EQS roles can be found in the EQS Security Model, dated August 2008.
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

Table 8 – System of Record (SOR)

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 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.)?	Name, ROSS ID, organizational code, position certification code, official title, etc
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> .)	Docket No. APHIS-2008-0039 is the SORN for EMRS. Responder data was originally captured in EMRS, it is now captured in EQS.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## 4 Technology

Table 9 – 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.





### Privacy Impact Assessment Authorization

### Memorandum

I have carefully assessed the Privacy Impact Assessment for the  
Emergency Qualification System (EQS)

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 – Robert Green

September 29, 2009

Date

Agency ISSPM/CISO - Ja'Nelle DeVore

September 30, 2009

Date

USDA's Chief FOIA Officer  
or Senior Official for Privacy  
or Designated Privacy Person

9/29/09

Date

APHIS OCIO

10/16/09

Date