



Privacy Impact Assessment

FSIS Meat & Poultry Hotline 2.0 Application

Revision: 05

FSIS

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Document Information

Owner Details	
Name	Diane Van
Contact Number	301-344-4777
E-mail Address	Diane.Van@fsis.usda.gov

Revision History			
Revision	Date	Author	Comments
00	1-26-09	J. Casey	Added Cover page, Used CCMS II PIA as template, removed CCMS II specific data from pgs. 2-5 Added Hotline Application specific content, marked in green. Added more Hotline App specific content, marked in green. Marked CCMS II specific content in yellow – this may or may not be relevant to our application’s treatment of Complaint data. Marked some sections in red—these sections seem to relate to CCMS II, but not to the Hotline app.
01	5-7-09	J. Casey	Updated format with latest PIA template. Updated content with feedback from PTA document received from E. Penner. Removed highlighting.
02	5-11-09	J. Casey	Continued adapting PIA document from older format to current format, incorporating HOTLINE Specific information
03	10-20-09	J. Casey	Edited to accept additions and suggestions from J. Nelson
04	10-21-09	J. Casey	Final version, deleted comments.
05	11-10-09	Christopher Douglas	Incorporated comments received from CTO

Distribution List			
Name	Title	Agency/Office	Contact Information
Tangela Rice	Project Manager	FSIS/OPEER/OCIO/ODCIO	202-205-2765 Tangela.Rice@fsis.usda.gov



Distribution List			
Name	Title	Agency/Office	Contact Information
Robert Tuverson	Director FSES	FSIS/OPACE/FSES	301-344-4747 Robert.Tuverson@fsis.usda.gov
Jeremy Wood	Branch Chief, Application Design and Development Branch	FSIS/OPEER/OCIO/ODCIO/BAD	202-690-6298 Jeremy.Wood@fsis.usda.gov
Charles Herrmann	PM	Avanti Corporation	703-916-1660 x 102 cherrmann@avanticorporation.com
Diane Van	System Owner	FSIS/OPACE/FSES	301-344-4777 Diane.Van@fsis.usda.gov
Eric Penner	Information System Security Officer	FSIS/OPEER/OCIO/OCTO/ISSP	202-418-8812 Eric.Penner@fsis.usda.gov
Robert Mosheyev	FSIS Framework PM	FSIS/OPEER/OCIO/ODCIO/BAD	Robert.Mosheyev@fsis.usda.gov
John Nelson	FSIS Privacy Officer	FSIS/OPACE/ECIMS	202-720-4655 John.Nelson@fsis.usda.gov



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1 System Information

System Information	
Agency:	FSIS
System Name:	FSIS Meat & Poultry Application
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>The application will be used by the Meat and Poultry Hotline staff to track the food safety inquiries received via its 800 telephone number and through inquiries to the USDA Meat and Poultry Hotline electronic mailbox.</p> <p>The Avanti team will design, develop, test and deploy a Hotline call management system for the USDA FSIS Meat and Poultry Hotline. The system will utilize existing FSIS infrastructure to develop a system which will integrate aspects of a CRM, Call Center Quality Monitoring system and Information outlet for consumers who contact the hotline.</p>
Who owns this system? (Name, agency, contact information)	Diane Van FSIS/OPACE/FSES Diane.Van@fsis.usda.gov 301-344-4777
Who is the security contact for this system? (Name, agency, contact information)	Eric Penner FSIS/OPEER/OCIO/OCTO/ISSP Eric.Penner@fsis.usda.gov
Who completed this document? (Name, agency, contact information)	James Casey, Avanti Corporation 5520 Cherokee Avenue, Suite 205 Alexandria, VA 22312 703.916.1660 jim@avanticorporation.com



2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p>The application will be used to capture data relating to calls and interactions with the Meat and Poultry Hotline. This will include general questions, comments, and informal complaints, none of which require the collection of PII.</p> <p>The application will also be used to support the Publication Request process. This process requires the collection of information which includes personal (but publicly available) information (i.e. name, address).</p> <p>The application will also collect formal complaints for forwarding to CCMS II.</p> <p>The system will collect information concerning consumers and any adverse affects caused by food products regulated by the USDA. This information includes personal (but publicly available) information (i.e. name, address, phone, email). The consumer will also provide general information concerning the nature of the complaint, product information, and point of purchase of the product.</p> <p>PII information is gathered, however, this information is not used for retrieval purposes.</p> <p>Furthermore, the application is designed to purge PII once the business process that requires the PII is completed (i.e. once the formal complaint has been sent to CCMS II, or once the requested publications have been mailed out.) Thus, the HOTLINE does not store PII permanently; rather, it holds the PII temporarily until the business process that requires the PII is complete.</p>
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	N/A



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 <p>The use of contact data is relevant and necessary for fulfilling requests for publications. If a caller wants to receive a publication, the Hotline staff needs to know where to send it.</p> <p>The collection of contact data is relevant and necessary for submitting formal complaints to CCMS II. If the caller wishes to have their complaint investigated, the CCMS team needs to be able to contact them.</p> <p>In each of these cases, the PII data is collected and used for the purpose described, but is not stored in the HOTLINE system once the described use has been effectuated.</p>
4	Sources of the data in the system.	<p>There are three sources of data in the system:</p> <ul style="list-style-type: none">1) Callers to the Hotline: Relevant information regarding calls (i.e. topic, subtopic) and broad demographic information about callers (state, caller type) manually entered into the system Callers' complaint information manually entered into the system; Callers' requests for publications and requisite delivery destination manually entered into the system2) HOTLINE Users: Users with the proper rights and permissions (i.e. Pub Manager and System Admins) can add, edit and delete data elements within the UI (i.e. dropdowns and pick lists) in the system.3) Legacy System Data There will be a one-time migration of data from the legacy system.



No.	Question	Response
4.1	What data is being collected from the customer?	<ul style="list-style-type: none">• Name (Pub Requests, Formal Complaints only)• Mailing address (Pub Requests, Formal Complaints only)• Type and number of Publications requested (Pub Requests only)• Medical notes (Formal Complaint only)• Other: Nature of Complaint [Primary complaint, Onset of symptoms, Symptoms, Foreign object, Description of complaint, Medical visit required, Lab confirmed diagnosis, Secondary complaint, Onset of symptoms, Symptoms, Foreign Object (type, size, and description), Description of secondary complaint]• Other: Product Information [Original packaging, Product name, Brand name, Package size and type, Package code, Sell by, Product remaining, Establishment number]• Point of Purchase [POP Name, POP purchase date, POP address, Point of Contact, Telephone] (Formal Complaint Only).• Caller's State / Country / Region• Caller Type (Consumer, Business, Media, Government, Medical Professional, Food Handler, etc),• Topic & Subtopic of the calls• Source and Source Type (how the caller learned of the Hotline)• Spanish Call flag• Referred To: (Where the caller was directed, if necessary)
4.2	What USDA agencies are providing data for use in the system?	None
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 type="checkbox"/> Yes <input checked="" 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?	N/A



No.	Question	Response
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A

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?	To support the Hotline's mission of disseminating food safety related information to the public. To aid in investigating and tracking potential public health crises. For management and reporting purposes relating to the activities of the Hotline
7	Will the data be used for any other purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	The Hotline Application Database will be used to compile data and generate reports that are specific to the operations of the FSIS Meat and Poultry Hotline. These reports or data extracts from the Hotline Application Database may be used by other external systems/program offices or agencies at the direction of the FSIS Hotline Application Manager, for trend analysis, outreach, and resource allotment; However no PII is used for this.
8	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.
8.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.2	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



No.	Question	Response
9	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?	<ol style="list-style-type: none"> 1. Data relating to general calls, questions, and informal complaints will be used for trend analysis purposes. 2. Data relating to Publication Requests will be used to generate mailing labels and fulfill the requests. 3. Data relating to formal complaints will be passed along to the CCMS II system and used by the agency to assist in the investigation of consumer complaints.
10	Will the data be used for any other uses (routine or otherwise)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 12.
10.1	What are the other uses?	<p>The HOTLINE system's data may be used for these routine uses of data found in Government Information System...however note that the HOTLINE purges PII regularly which limits the availability of that PII for these purposes.</p> <ol style="list-style-type: none"> 1. Routine use for disclosure to the Department of Justice for use in litigation: 2. Routine use for disclosure to adjudicative body in litigation: 3. Routine use for law enforcement purposes: 4. Routine use for disclosure to a Member of Congress at the request of a constituent: 5. Routine use for disclosure to NARA 6. Routine use for disclosure to contractors under section (m) 7. Routine use to HHS parent locator system for finding parents who don't pay child support 8. To appropriate agencies, entities, and persons when (1) [the agency] suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised;
11	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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13.
11.1	What controls are in place to protect the data and prevent unauthorized access?	N/A
12	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
12.1	What controls are in place to protect the data and prevent unauthorized access?	N/A



2.3 Data Retention

No.	Question	Response
13	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 15.
13.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	<p>This depends on the type of call record and the type of data.</p> <p>Formal Complaint information (including PII) is transmitted immediately to CCMS II. Upon confirmation that CCMS II has received the Formal Complaint, the PII information is purged from the system.</p> <p>Pub Requests records contain PII including the requestors name and address. Once the Pub Request has been processed and the requested materials have been mailed, the call record is flagged as complete and the PII is purged.</p> <p>Call records consisting of normal question inquiries do not, as a rule, collect any PII. Call records currently are stored in the system for a proscribed time period, until which time they will be destroyed or retired in accordance with the Department's published records disposition schedules, as approved by the National Archives and Records Administration (NARA). The retention period shall be based upon a combination business need (i.e., how long do we need this information for our business process) and long term usefulness.</p>
13.2	What are the procedures for purging the data at the end of the retention period?	<p>Formal Complaints are purged from the application upon successful transmission to CCMS II. This is an automated part of the transmission procedures.</p> <p>PII fields in Pub Requests are purged once the business processes the PII is used in have been manually flagged as completed in the system.</p> <p>Call Records will be destroyed or retired in accordance with the Department's published records disposition schedule as approved by NARA.</p>



No.	Question	Response
13.3	Where are these procedures documented?	The procedures for handling the disposition of PII are documented in the System Design Document, the Process Diagrams, Workflow documentation, and training materials. Procedures for dealing with the ultimate disposition of call records can be found in the Department Records Retention Schedule.
14	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?	If a Pub Request call record has not yet been marked as processed, it is still considered relevant and timely. Aside from this distinction, the validations and edit checks that run during the creation of a call record ensure their completeness and accuracy.
15	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
16	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.
16.1	How will the data be used by the other agency?	N/A
16.2	Who is responsible for assuring the other agency properly uses the data?	N/A
17	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
17.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	N/A
18	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 20. The HOTLINE system is accessed from the George Washington Carver Center and from remote locations by HOTLINE staff working from their Government issued laptops via a secure VPN connection.



No.	Question	Response
18.1	How will consistent use of the system and data be maintained in all sites?	Hotline Agents may use the HOTLINE application from home. Access to the application from remote locations will require a secure VPN and the same authentication process as on site use.

2.5 Data Access

No.	Question	Response
19	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	<p>We've identified the following user groups:</p> <ul style="list-style-type: none">• Users (Hotline Agents)• Pub Manager• Administrators• Report Users• Manager On Duty (MOD)• Security Users <p>Users will have access to specific input data in capturing and entering Call Records, Formal Complaints and Publication Requests</p> <p>Pub Managers will have access to data for purposes of processing Pub. Requests.</p> <p>Administrators will be able to access all information from a system administration and maintenance perspective.</p> <p>Report users will have access to the standard and Ad Hoc reporting systems.</p> <p>Manager On Duty will have access to specific management functions.</p> <p>Security Users will have access to audit logs and security monitoring functions.</p>
20	How will user access to the data be determined?	<p>The Security Module will authenticate users based on the credentials entered during login. Authenticated users will have access based on the principle of least privilege. Criteria, procedures, controls, and responsibilities regarding access are documented in the System Roles Matrix document.</p>



No.	Question	Response
20.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Criteria, procedures, controls, and responsibilities regarding user access are documented in the System Security Plan, the Design Documents, and the User Roles Matrix document.
21	How will user access to the data be restricted?	Controls that are in place to prevent the misuse of data by those having access are: <ol style="list-style-type: none">1) Security, Authentication, and Access will be managed via the Security Module2) The Hotline Application implements role-based access control.
21.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Best practices deterring browsing are supported in training material for the hotline, and all Hotline agents sign a Rules of Behavior before being granted access to the system. Additionally, audit records will be used to monitor traffic and access to the records. If the user attempts to access a resource or functionality that their privilege does not apply to, the system will restrict their access and prevent the user from accessing those functions.
22	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 The HOTLINE uses encryption for sensitive data, such as passwords. Thus, even if such data was accessed by an unauthorized individual, that individual would find the information unusable without the decryption key.



2.6 Customer Protection

No.	Question	Response
23	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.)?	<p>Ultimately, the system owner will be the responsible party.</p> <p>In addition, the responsibility for protecting the privacy rights of the customers and employees affected by the interface also belongs to any employee who is working within the HOTLINE application.</p>
24	How can customers and employees contact the office or person responsible for protecting their privacy rights?	<p>The USDA's Quality of Information Guideline's correction mechanisms are not intended to imply any rights of individuals to request amendment of their own records beyond those permitted by the Privacy Act of 1974 or other organization-specific laws. All requests for correction of FSIS information must be submitted by letter, fax, or Email to the FSIS FOIA Officer at</p> <p>FSIS Freedom of Information Act Office Room 1140-South Building 1400 Independence Avenue, SW Washington, DC 20250-3700</p> <p>- Phone: (202) 690-3882 - Fax: (202) 690-3023 - Email: fsis.foia@usda.gov.</p>
25	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?	<p>Yes. United States Department of Agriculture Incident Notification Plan - http://www.ocio.usda.gov/directives/doc/DM3505-000.htm</p>
25.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	N/A
26	<p>Consider the following:</p> <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 <p>Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No – If NO, go to question 28.</p>
26.1	Explain how this will be mitigated?	N/A
27	How will the system and its use ensure equitable treatment of customers?	N/A



No.	Question	Response
28	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
28.1	Explain	N/A

3 System of Record

No.	Question	Response
29	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 While PII is in our system, it could potentially be used to retrieve a record; however that is not the primary record retrieval method supported. Once the purpose the PII has been collected for has been completed, the PII is deleted from the system and records cannot be retrieved using PII
29.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data is retrieved via ticket number, a unique identifier assigned to each record.
29.2	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 .)	SOR is currently in process.
29.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

4 Technology

No.	Question	Response
30	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.
30.1	How does the use of this technology affect customer privacy?	N/A



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.

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INFORMATION OFFICE FOR CYBER SECURITY.