Privacy Impact Assessment
Veterinary Services Laboratory Information System (VS LIMS)

Policy, E-Government and Fair Information Practices

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Privacy Impact Assessment for the

VS Laboratory Information Management System (VS LIMS)

April 18, 2023

Contact Point

Suelee Robbe Austerman
System Owner
Director, National Veterinary Services Laboratories,
APHIS/VS/D&B

Reviewing Official
Tonya Woods
Director, Freedom of Information and Privacy Act Staff
United States Department of Agriculture

Abstract

The National Veterinary Services Laboratories (NVSL) provides laboratory services for the Animal and Plant Health Inspection Service (APHIS). The NVSL focuses on diagnostic services and reagents. The Veterinary Services (VS) Laboratory Information Management System (LIMS) is used to track and manage diagnostic testing, reagent and agent inventory efforts at NVSL. LIMS tracks diagnostic samples from sample submission to final report. USDA APHIS is conducting this PIA because LIMS collects, uses, maintains, and disseminates personally identifiable information (PII) from individuals to performs laboratory testing.

Overview

The Animal Health Protection Act provides the Secretary of Agriculture broad authority to prohibit or restrict, through orders and regulations, the importation or entry of any animal, article, or means of conveyance if U.S. Department of Agriculture (USDA) determines that the prohibition or restriction is necessary to prevent the introduction or spread of any pest or disease of livestock within the U.S.

Disease prevention is the most effective method for maintaining a healthy animal population and for enhancing the U.S.' ability to globally compete in the trade of animals and animal products. Animal disease prevention cannot be accomplished without the existence of an effective disease surveillance program. This function is carried out by the Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS).

The National Veterinary Services Laboratories (NVSL) safeguard U.S. animal health and contribute to public health by ensuring that timely and accurate laboratory support is provided by their nationwide animal-health diagnostic system. As part of its mission, NVSL accomplishes this by providing diagnostic services and reagents. NVSL supports elements of the APHIS disease prevention mission.

NVSL offers diagnostic or reagents services. Diagnostic services range from a single laboratory test to comprehensive laboratory services covering many pathogens for a suspected disease outbreak. Diagnostic reagents are produced by NVSL as needed for veterinary diagnostic use when a commercial source of reagent is not available or when commercial sources are not fulfilling diagnostic needs.

NVSL has several forms specifically designated for submission of samples to the NVSL or to request reagents.

- **Diagnostic Services:** The most common diagnostic form is the Specimen Submission Form VS 10-4[1] and may be accompanies by supplemental forms that best fits the type of sample being submitted for testing.[2] Both form and

[1] https://www.aphis.usda.gov/library/forms/pdf/VS_Form10_4.pdf
[2] USDA APHIS | Lab-Related Forms (NVSL)

samples are to be submitted according to the instructions and linked to the NVSL Submitter ID. Each submitter is assigned a unique system-generated identifier assisted by NVSL VS LIMS.

- **Reagents**: Reagent requests are completed through the Reagent Requests and Supplies VS 4-9.[3]

These NVSL forms and services may be submitted via physical paper or via the NCAH Portal.[4] The NCAH Portal is used by customers to submit paperwork electronically for submissions to the NVSL.[5] The forms collect PII about the requestor, animal owner, veterinarian, and USDA personnel. The PII collected by NCAH Portal is governed under a separate PIA.

All incoming specimen and reagent forms are added into VS LIMS. Paper forms are scanned into LIMS. Electronically filed forms are pushed via system interconnection. VS LIMS is the NVSL laboratory case management system for diagnostic samples and reagent submissions. Information from the NVSL form entered into the LIMS includes test results, submitter, animal owner, financial information, agent and reagent inventory samples, and sample information.

Each submission in queued for diagnostic testing or reagents. Once the testing is complete, information from the diagnostic reports contain official diagnostic results are added in VS LIMS. USDA employees enter data from laboratory records in the VS LIMS application. LIMS captures the tests results as well as a chain of custody to ensure the testing was appropriately conducted. Regulations and laboratory accreditation requirements include chain of custody requirements require owner/submitter name to be included on official reports and tracked alongside the life of the sample. Official reports are used for export; import, and associating germ plasm with animals.

Test results are released to submitters in real-time as they become available by NVSL in LIMS. The Searchable Test Result Application for NVSL Diagnostics (STRAND) is part of LIMS and owned by NVSL. STRAND is the customer user interface that allows submitters to view test results, reports, and submission forms which have been released by the NVSL from LIMS. End users register for an account and the list of recipients (for test results for example) is defined by the internal NVSL LIMS system users. Customers can only view output associated and linked to their submission. STRAND contains all information released on reports from the NVSL including submitter, owner, animal, and test result information. Automated reports are delivered via email or fax when authorized for release. Reports are also mailed, or emailed to an appropriate list of recipients defined by the system users.

Section 1.0 Characterization of the Information

[3] https://www.aphis.usda.gov/library/forms/pdf/VS_Form4_9.pdf
[4] NCAH Portal (usda.gov)
[5] https://www.usda.gov/sites/default/files/documents/mrp-nqm-pia.pdf

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?

Information collected about submitters of diagnostic samples and reagents include:

- Name
- NVSL Submitter ID
- User Fee Account Number
- Mailing, Billing, Shipping Address (street, city, zip code)
- Phone Number
- Fax Number
- E-mail
- Credit Card Number and expiration date
- Check or Money Order Number
- Signature

Information collected about federal employee information include:

- Name
- Job Title
- Business Phone number
- E-mail
- Supervisor
- Organizational Group within NVSL and Center for Veterinary Biologics (CVB)

Information collected about contractors include:

- Name
- E-mail
- Phone number (if provided)

Information collected about Wildlife/Zoo/Owner include:

- Name
- City
- State
- Zip
- Country
- Premises ID

Information about the veterinarian and non-veterinarians include:

- Name

- National Accreditation Number (accredited veterinarians only)
- Authorized by

Tuberculosis Sample Information:

- Food Inspector Name
- Veterinarian Name
- Market Buyer Name
- Market Buyer Address

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

The sources of information in LIMS are from completed forms that accompany laboratory specimens sent into the laboratory for diagnostic testing via the physical form or through the NCAH portal, which support electronic versions of the submission form. Forms are completed by State veterinarians or other State representatives, accredited veterinarians, private laboratories, and research institutions. Authorized individuals complete the form using information obtained through discussions with the animal owners.

Samples are received from State and private veterinary diagnostic laboratories, private veterinary practitioners, Federal meat inspectors, Federal field veterinarians, and others. In addition, the NVSL receives laboratory samples from other countries for import cases and for cases where diagnostic assistance is requested. The system also contains an inventory of biological reference and reagent material developed at the NVSL.

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

The animal disease surveillance program is based on the information submitted through the submission forms. NVSL requires the submission of specimens with appropriate forms to ensure proper identification of the samples. The PII collected and maintained in LIMS is necessary to conduct business and to satisfy the diagnostics and surveillance piece of the VS mission. Each specimen for laboratory analysis must be accompanied by the appropriate documentation to identify the point of contacts, as well as the animals and herds from which the specimens were taken. The PII identifies where samples are from and who submitted them in the event a non-negative result is found, regardless of which disease NVSL happens to be testing for. The information is critical to effectively operate a disease surveillance program.

1.4 How is the information collected?

The information is collected using the OMB-approved NVSL submission form that best fits the type of sample being submitted. The NCAH portal, which has electronic

versions of submission forms, or a hard copy NVSL submission form is submitted with every group of samples submitted:

- VS 10-4 – General Specimen Submission (OMB No. 0579-0090)
- VS 10-3 – Request for Salmonella Serotyping (OMB No. 0579-007)
- VS 10-7 – Specimen Collection Bovine Tuberculosis, Reactors, Suspects and Trace-Exposed (OMB No. 0527-0146)
- VS 5-38 – Parasite Submission Form (OMB No. 0579-0090)
- VS 6-35 – Report of Thoracic Granulomas in Regular Kill Animals (OMB No. 0579-0146)
- VS 4-54 – Brucellosis Test Record Market Cattle Testing Program (OMB No. 0579-0047)
- VS 5-14 – Dip Sample Data
- VS 17-31 – Equine Import Testing Submission

The submission forms are scanned into the LIMS as part of the accessioning process. In addition, an inventory of biological reference and reagent material is maintained by authorized NVSL employees.

1.5 How will the information be checked for accuracy?

The following steps are taken for data verification:

1. Submission form received at USDA and data entered by receiving technician or submission information is imported via the portal. This information is reviewed by the lab technician.
2. Sample testing is performed and documented by lab technician.
3. Test results are entered into the system by a data entry clerk or lab technician. These results are reviewed by a lab manager.
4. Lab Manager checks for accuracy by reviewing submission documents and test result's document that were entered into the system by a clerk or technician. This is also a verification process that includes PII and lab results together.

Data are randomly audited by internal quality assurance personnel. Data are occasionally audited by external auditors conducting peer reviews or accreditation audits to ensure the NVSL is adhering to strict ISO accreditation standards. A group of SQL statements run weekly to look for data integrity issues. These SQL statements currently check for errors in a variety of areas (including but not limited to):

- Closed accessions where all appropriate accession level data appropriately shows the accession as closed.
- Closed accessions with parent samples that have not either been authorized or cancelled.
- Accessions flagged as part of an outbreak, but the outbreak name is null.
- Billable accessions where there are errors in billing data.

Whenever a developer notices a new problem with data, they are asked to develop a SQL statement that can be used to detect if that data problem comes up again in the future.

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

- U.S Legal Code: Title 7, Chapter 9, #8308 is invoked to validate the collection of information.
- U.S Legal Code: Title 7, Chapter 9 #8308: Detection, control and eradication of diseases and pests:

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

There is the privacy risk that more information than necessary is collected to facilitate disease surveillance. The foundation NVSL is based on the information submitted on the submission forms. Only the minimum amount of information is collected to the individual submitting the specimen samples. NVSL LIMS requires submission of specimens with the submission forms to ensure proper identification of the samples. No purpose would be served by submitting a specimen for laboratory analysis that is not accompanied by the appropriate documentation to identify the animals and herds from which the specimens were taken.

To limit inadvertent exposure to LIM, access is limited to NVSL employees. User accounts control the permissions in the LIMS. The LIMS functions are assigned to roles. A user account is granted one or more roles. At login, the user must select a role they have been granted which enables the associated functions. Users only see roles they have been granted. Row level access to information is enforced by the application. There are approximately 200 users to the system. The users are APHIS employees that are located at the USDA offices in Ames, Iowa, Plum Island, New York, Manhattan, Kansas, and Dorado, Puerto Rico.

Submitting veterinarians, Area Veterinarian in Charge, and State veterinarians are only provided read test reports through STRAND, which is fed by LIMS. This group does not have direct access to LIMS. Submitting veterinarians, Area Veterinarian in Charge, and State veterinarians must authenticate to STRAND via an eAuthentication Level 2 account (authorization without PIV) and are granted read-only permissions to view the results for tests which they have submitted.

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.

The LIMS is a laboratory information system that tracks and saves test results on animal diagnostic samples received at the NVSL. LIMS is used to

- Link specimens (such as blood, milk, tissue, or urine) from any animal (including cattle, swine, sheep, goats, horses, and poultry) submitted to NVSL for disease testing. The PII included in the forms are used to link the submitter to the specimen and identify the owner. State veterinarians or other State representatives, accredited veterinarians, private laboratories, and research institutions submit submission forms to APHIS for diagnostic services. Authorized individuals complete the form using information obtained through discussions with the animal owners.
- Make a payment for the rendered diagnostic services.
- Document the results of individual animal disease testing performed by or under the auspices of the NVSL. Records include official test reports for animal import, export, movement, and program disease status certifications. Also included are official test results for suspected foreign animal disease investigations and for animal diseases targeted by the USDA for control or eradication.
- Report results of testing to submitters and state and federal animal health officials for various regulatory purposes. These reports are used to document testing required for animal movement and commerce. These records utilize PII to allow for traceability. LIMS records are also used to monitor the performance of testing required to meet disease program requirements. The records are also used to monitor disease spread and transmission.
- Provide current and historical data used for detecting animal diseases, conducting emergency responses, conducting and evaluating animal disease control measures, performing epidemiological investigations, and forecasting possible animal disease occurrences and outbreaks.

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

LIMS uses Crystal Reports and a PDF toolkit, which are integrated with the LabWare Commercial-Off-The Shelf (COTS) software. The analysis of data by the system is limited formatting functionality offered by Crystal Reports and the PDF file format.

The system can produce reports based on queries of specific fields which are then manually analyzed by APHIS VS NVSL staff. These internal reports are typically used to assess workflow and identify if results for a particular case are outstanding. Also, workload reports are produced which help us identify issues. The only formal data that

is released to the public from LIMS are laboratory diagnostic reports (contain PII as previously described), packing slips (contain reagent order information) and invoices for work that NVSL performs on a user fee basis.

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

The system 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.

There is the privacy risk that the information may be used beyond diagnostic testing for disease surveillance. Disease prevention is the most effective method for maintaining a healthy animal population and for enhancing the U.S' ability to globally compete in the trade of animals and animal products. NVSL provide laboratory testing on behalf of APHIS and provides a wide variety of information and services, centered on diagnosis of domestic and foreign animal diseases, support of disease control and eradication programs, reagents for diagnostic testing, training, and laboratory certification. Animal disease prevention cannot be accomplished without the existence of an effective disease surveillance program. The information collected and used are critical components of APHIS' disease surveillance mission.

To ensure the information is safeguarded and used in alignment if NVSL, LIMS implements the security controls to address access to and security of information. The following controls are employed:

- All access to the data in the system is controlled by formal authorization. Each individual's supervisor must identify (authorize) what functional roles that individual needs in the LIMS system.
- All access to the system is limited by username and password.
- All access to the network is limited by PIV and pin two factor authentication.
- Access to information in the system is controlled using role-based access that limits access to relevant information and prevents access to unauthorized information.
- Users are trained and are required to formally confirm that they understand value and sensitivity of data in the system.
- All users receive formal system training and are required to pass a proficiency test before being given access to the system.
- Warning banner must be acknowledged before logging in.
- As described above in section 1.7, parties external to USDA can only read test reports through STRAND, which is fed by LIMS, thus protecting submitter PII

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?

In accordance with the Federal Records Act (FRA) LIMS records will be retained indefinitely until NARA approves the proposed retention schedule. Under the proposed schedule submitted for NARA approval, paper records would be retained for a minimum of 3 years, data would be maintained in the system for 25 years and would be archived at 5-year intervals.

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

The LIMS retention schedule is pending NARA final approval. The APHIS Records Officer approved the proposed retention period and transferred the schedule to NARA for final approval.

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

There is an inherent risk that PII is retained longer than necessary to fulfill specified purposes. The proposed LIMS retention period is consistent with the concept of retaining data only for as long as necessary to support NVSL' mission and core functions. The proposed retention schedule is based upon a need to keep the records available in case there are any questions or complaints. The proposed schedule complies with the requirements of the FRA and the stated purpose and mission of NVSL. Until a NARA-approved retention schedule for LIMS is complete, APHIS plans to maintain all records indefinitely in accordance with the FRA, which prohibits agencies from destroying records without a NARA-approved schedule.

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?

For customers who pay via National Finance Center (NFC), LIMS billing data for diagnostic testing and reagents is transferred to the NFC via the APHIS/VS User Fees

System (UFS). LIMS interfaces with USF and electronically transmits some PII to that system. The information transmitted includes a customer's name, address, city, state, and case reference number. PII is used to match up the records between systems so users can be accurately charged.

The Emergency Management Response System (EMRS) 2.0, which is used to manage the investigation of U.S. animal disease outbreaks. LIMS receives data from EMRS 2.0 via electronic order messaging. The information transmitted includes submitter and owner name, address, city, state. PII contained within diagnostic reports is also shared via electronic messaging to the LIMS to other authorized systems within VS. This sharing of information is compatible with the purpose of diagnosing animal diseases and supporting VS disease control and eradication programs.

Information is also shared within USDA that includes report data released by the NVSL to the APHIS VS Field Operations District Directors. Reports may include customers name, address, city, state, and case reference number. Information is also shared with VS staff for administration, oversight, and decision-making about animal disease program activities, and USDA officials for investigating possible violations of USDA regulations and Federal laws. This sharing of information is compatible with the purpose of diagnosing animal diseases and supporting VS disease control and eradication programs.

4.2 How is the information transmitted or disclosed?

Information disclosed within USDA is transmitted via system interconnection or secure messaging. All access to LIMS is internal to USDA APHIS staff.

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.

- All access to the data in the system is controlled by formal authorization.
- All access to the system is limited by username and password or eAuthentication.
- The application limits access to relevant information and prevents access to unauthorized information.
- Users are trained and required to formally confirm that they understand value and sensitivity of data in the system.
- All users receive formal system training and are required to pass a proficiency test before being given access to the system.
- Warning banner must be acknowledged before logging in.

- Shared information is restricted to what pre-defined views and procedures allow.
- All information sharing with internal systems is done over the internal APHIS network.
- Encryption of information in transit between systems is defined by the host systems (USDA APHIS VS UFS and National Animal Health Laboratory Network Information System), not LIMS. LIMS will comply with mandated encryption settings when communicating with said systems.

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?

USDA also shares results with submitting veterinarians and government (State, Tribal, local, etc.) animal health officials receive test reports through STRAND. The STRAND application is fed by LIMS, but they have no direct access to LIMS. Data is retrieved by either an accession number, which is a system generated ID, or a sample number which was assigned by the submitter. Searches may also be performed using PII such as submitter first name, last name, or company name to determine accession numbers associated with their submitter number.

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.

Yes. Routine Use (1) authorizes USDA to share information with the submitting veterinarian and government (State, Tribal, local, etc.) animal health officials of the submitter, owner, and animal location to provide test results.

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

Submitting veterinarians and State veterinarians receive test reports by email and/or through STRAND, but they have no direct access to LIMS.

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

The risks identified are minimal as they will only include sharing names and addresses of animal owners that are likely to be easily available to the State Veterinarians through other avenues such as plat maps or property tax records. The risks are mitigated through only sharing the data with the submitting veterinarian and State veterinarians of the submitter state, animal owner state, and animal location state that need to be aware of diseases and tests results in their state.

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 Does this system require a SORN and if so, please provide SORN name and URL.

Yes, APHIS-19 Laboratory Information Management System, https://www.federalregister.gov/articles/2013/10/01/2013-23868/privacy-act-systems-of-records-labware-laboratory-information-management-system

6.2 Was notice provided to the individual prior to collection of information?

Individuals submitting forms for diagnostic testing are provided notice. The Privacy Notice informs the individual about the authority to collect the information requested, purposes for collecting it, routine uses, and consequences of providing or declining to provide the information to APHIS. These forms are subject to the Privacy Act and are out of scope for this PIA. Additionally, the public receives general notice through the publication of this PIA and associated SORN.

LIMS is an internal system used by USDA employees and is not subject to Section (e)(3) of the Privacy Act. STRAND, which is the customer user interface, only provides the test results and not subject to the Privacy Act.

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

No, individuals that submit samples to be tested at the laboratory must submit all data required to assign appropriate test and report results. Individuals are not compelled to submit samples to the laboratory, however if information is not submitted, services will not be provided by APHIS.

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

No, the submitters' data are treated uniformly.

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

Notice is provided to customers through the NVSL website, diagnostic forms, this PIA, and APHIS SORN 19. Data is collected with the individual's knowledge, and data is voluntarily submitted to the laboratory along with test samples.

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?

Individuals seeking access to his or her APHIS records by filing a Privacy Act[6] or Freedom of Information (FOIA)[7] request. Only U.S. citizens and lawful permanent residents may file a Privacy Act request. Any person may file a FOIA request. USDA offers several avenues to request access to their records. Individuals may file a Privacy Act or FOIA request to view their record by submitting a FOIA request online through USDA's Public Access Link (PAL), or through mail or fax.[8]

USDA – Animal and Plant Health Inspection Service
FOIA/PA Director
4700 River Road, Unit 50
Riverdale, MD 20737
Facsimile: 301-734-5941
Email: APHISPrivacy@usda.gov

Further information about Privacy Act and FOIA requests for APHIS records is available at https://www.aphis.usda.gov/aphis/resources/foia.

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

[6] https://www.aphis.usda.gov/aphis/resources/lawsandregs/privacy-act/request-access
[7] https://www.aphis.usda.gov/aphis/resources/foia
[8] https://efoia-pal.usda.gov/App/Home.aspx

Inaccurate data are corrected by submitting requests to the Information Management group at the laboratory, and laboratory manager approval is required for corrections to be made, and detailed auditable records are produced when changes are made identifying who authorized and made the change, and when it was made. An individual may also correct his or her records by filing a Privacy Act request. The request should clearly state the information that is being contested, the reasons for contesting it, and the proposed amendment to the information.

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

The NVSL website includes outreach materials and contact information. Individuals may direct any inquires.[9] Individuals and the APHIS procedures can be found online. The USDA/APHIS – 19 Laboratory Information Management System SORN provides individuals with guidance regarding the procedures for correcting information. This PIA also provide notice to individual about the procedures for correcting their information. Additionally, APHIS notifies individuals the Privacy Act and FOIA procedures on the APHIS website.

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

Not applicable. NVSL affords individual with a formal process.

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

APHIS has a formal redress procedure in place and there is minimum risk to privacy rights. However, there is the privacy risk that members of the public may submit PA/FOIA requests seeking diagnostic results of their local area and inadvertently access PII and diagnostics results of submitters. USDA mitigates this risk by working with APHIS FOIA to ensure PII is redacted before PA/FOIA responses are returned to the requestor.

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?

[9] https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/lab-info-services/sa_about_nvsl/ct_about_nvsl

APHIS VS LVSL deploys user role-based access controls and enforces a separation of duties to limit access to only those individuals who have a need-to-know to perform their duties. Each operational role is mapped to the set of system authorizations required to support the intended duties of the role. The mapping of roles to associated authorizations enhances adherence to the principle of least privilege. Authorized users are broken into specific classes with specific access rights. This need-to-know is determined by the respective responsibilities of the employee. These are enforced through the eAuthentication process, which includes USCIS APHIS VS NVSL approval.

8.2 Will Department contractors have access to the system?

Yes, contractors supporting USCIS APHIS VS NVSL have access to VS LIMS. NVSL has interagency agreements with the Department of Energy's Oak Ridge Institute for Science and Education (ORISE) to administer a post doctorial training program where fellows work side by side with NVSL employees where they are provided the training to obtain network access and access to the LIMS.

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

All APHIS VS NVSL employees and contractors are required to complete annual Information Technology (IT) Security Awareness Training and must sign USDA Rules of Behavior form prior to receiving access to the information system. Users are trained and are required to formally confirm that they understand the value and sensitivity of data in the system. All users receive formal system training and are required to pass a proficiency test before being given access to the system.

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

Yes. This application has an Authority to Operate (ATO) letter dated May 11, 2020.

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

APHIS VS NVSL ensures that practices stated in this PIA comply with internal policies, standard operating procedures, training, and rules of behavior through auditing. VS LIM includes an audit trail capability to monitor user activities and generate alerts for unauthorized access attempts. On the logon page, individuals are required to read and acknowledge a logon warning banner that describes the conditions of use and access, as well system monitoring. The banner defines the consequences of authorized and unauthorized access. Auditing is enabled both at the application and database level. Application-level auditing is defined by the vendor and enabled in the LIMS implementation. Database-level auditing is implemented and monitored according to

internal standard operating procedures. The audit records are monitored to ensure the proper use of the system.

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 are minimal privacy risks associate with security controls. USDA APHIS VS LVSL has appropriate technical controls based on the sensitivity of the data to securely maintain the data within LIM. The application of these controls is maintained annually and independently tested on an annual basis.

Section 9.0 Technology

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

9.1 What type of project is the program or system?

The LIMS is a laboratory information system that tracks and saves test results on diagnostic samples received at the USDA APHIS VS D&B NVSL.

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

This application does not employ technology which may raise privacy concerns.

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”?

The ISSM and System Owner have reviewed the memorandums.

10.2 What is the specific purpose of the agency's use of 3rd party websites and/or applications?

N/A. LIMS does not use 3rd party websites and/or applications.

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

N/A. LIMS does not use 3rd party websites and/or applications.

1 10.4 How will the PII that becomes available through the agency's use of 3rd party websites and/or applications be used?

N/A. LIMS does not use 3rd party websites and/or applications.

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

N/A. LIMS does not use 3rd party websites and/or applications.

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

N/A. LIMS does not use 3rd party websites and/or applications.

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

N/A. LIMS does not use 3rd party websites and/or applications.

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

N/A. LIMS does not use 3rd party websites and/or applications.

10.9 Will the activities involving the PII that becomes available through the agency's use of 3rd party websites and/or applications require

either the creation or modification of a system of records notice (SORN)?

N/A. LIMS does not use 3rd 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?

Not Applicable.

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.

N/A. LIMS does not use 3rd party websites and/or applications.

Agency Responsible Officials

SUELEE ROBBE AUSTERMAN
Digitally signed by SUELEE ROBBE AUSTERMAN
Date: 2023.11.21 12:28:28 -06'00'

Suelee Robbe Austerman
System Owner
Director, Diagnostic and Biologics, VS NVSL
United States Department of Agriculture

Date

Agency Approval Signature

Janelle Jordan
Digitally signed by Janelle Jordan
Date: 2023.11.21 17:16:42 -05'00'

Tonya Woods
Privacy Act Office (PAO)
Marketing and Regulatory Programs
United States Department of Agriculture

Date

ANGELA COLE
Digitally signed by ANGELA COLE
Date: 2023.11.21 17:52:50 -05'00'

Angela Cole
Chief Privacy Officer/Deputy Assistant Chief Information Security Officer
Marketing and Regulatory Programs
United States Department of Agriculture

Date