

# Privacy Impact Assessment Animal Care Information System (ACIS 3.0)

Technology, Planning, Architecture, & E-Government

- Version: 1.4
- Date: February 20, 2019
- Prepared for: USDA OCIO TPA&E



# Privacy Impact Assessment for the Animal Care Information System (ACIS 3.0)

February 20, 2019

**Contact Point**

**Kay Carter-Corker**  
APHIS Animal Care (AC)  
301-851-3748

**Reviewing Official**

**Tonya Woods**  
APHIS Legislative and Public Affairs (LPA)  
(301) 851-4076

**Danna Mingo**  
APHIS Information Security Branch (ISB)  
(301) 851-2487

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

## Abstract

System Name	Animal Care Information System (ACIS 3.0)
System Description	ACIS 3.0 is used by AC personnel 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 3.0 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 3.0)
System Owner	Betty Goldentyer (301) 851-3744 Betty.J.Goldentyer@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 on cooperating and regulatory entities.
General Description	The system is used by Animal Care organization to maintain a record of activities conducted by regulated entities and the agency pursuant to the Animal Welfare Act (AWA, 7 U.S.C. 2131-2159), the Horse Protection Act (HPA, 15 U.S.C. 1823-1825 and 1828) and the regulations issued thereunder.
Description of Typical Transaction Conducted	ACIS 3.0 collects and manages customer data and records related to licensing, registration, permitting, compliance, and regulatory correspondence under the AWA, which are part of the Animal Care collection. AC personnel access the customer's name and other identifying information (including their address, phone number, and email address), inspection and animal inventory and usage information, complaints of alleged violations, and enforcement and other compliance records and correspondence. The system also allows Horse Industry Organizations (HIOs) to electronically complete the reporting requirements for the Horse Protection Act (HPA) with data gathered from horse events around the country and serves as a repository for various management reports and business process documentation.

<p>Information Sharing</p>	<p>ACIS 3.0 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 other systems.</p>
<p>Description of the ACIS 3.0 subsystems</p>	<p>The ACIS 3.0 database is designed to support the Animal Welfare Act (AWA), the Horse Protection Act (HPA), Management Support system (MSS), and AC-Content Management System (CMS).</p> <ol style="list-style-type: none"> <li>1. The AWA portion contains information on individuals and businesses with certificates and others that may require a license, registration, or permit under the AWA. AWA inspection reports are generated by the database with data that is entered in to ACIS 3.0 by AC personnel.</li> <li>2. The HPA portion contains information on Horse Industry Organizations (HIO) and persons licensed by them to inspect horses under the HPA and data on alleged violations. The ACIS 3.0 information flow for online and offline application can be found in ACIS 3.0 Application Design document.</li> <li>3. MSS is a reporting module used by AC staff members who 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 3.0 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.</li> <li>4. AC-CMS provides a central point for information sharing whereby ACIS 3.0 business processes, standard operational procedures, and data can be shared internally among AC staffs in AC 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 the AWA and</li> </ol>

---

	HPA and regulations, policies, and guidance issued thereunder.
Legal Authority to Operate the system	ACIS 3.0 is a steady-state system. It has an ATO and is categorized as a “Moderate” system.

---

## 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?

Animal Welfare Act Records:

The system includes paper and electronic records that include:

Licensing and registration records, including, but not limited to, name and business or home address, telephone number, and other contact information; tax identification number, customer number, license or registration certificate number; licensee and research facility annual reports related to persons who seek or hold an AWA license or registration, persons responsible to ensure humane care of the animals (e.g., attending veterinarians) located at AWA regulated facilities; payment details such as name, last four digits of credit card and expiration date, or check numbers and amount for those who have applied for a license or renewal of a license requiring a payment; and other records required for regulatory purposes under the AWA.

Compliance records, including, but not limited to, inspection reports, itineraries, enforcement actions, and other compliance records required to be maintained by the facility and supporting documents, compliance- and enforcement-related activities, and other records required for regulatory purposes under the AWA.

Regulatory correspondence, including, but not limited to, information related to the denial or termination of a license or permit, and notices or advisories regarding alleged violations or noncompliance with the AWA, records related to administrative and court litigation, correspondence between APHIS and a licensee/registrant/permittee or applicant, and other records required for regulatory purposes under the AWA.

Complaint records, including, but not limited to, witness or person who has submitted information, and statements of alleged violations and violations by persons who are subject to the AWA.

Permit records, including, but not limited to, name, address, and other contact information for the permittee, permit application, health certificate, rabies vaccination certificate, etc.; and other records required for regulatory purposes under the AWA.

Horse Protection Act Records:

The system includes paper and electronic records that include:

Management records, including, but not limited to, name, business and/or home address, other contact information for managers or other management representatives, sponsoring organizations, persons designated to maintain management records, show judges, etc.; details of events and locations, including, but not limited to, dates and addresses; and other records required for regulatory purposes under the HPA.

Transporter records, including, but not limited to, name, address, and other contact information of the horse owner and the shipper, the trainer, the carrier transporting the horse, the driver of the means of conveyance used; the origin of the shipment and date thereof and the destination of shipment; and other records required for regulatory purposes under the HPA.

HIO records, including, but not limited to, the name, address, and other contact information of each certified HIO, and officers or persons charged with the management of the HIO; the HIO's formal request for certification and detailed outline for such program submitted for Departmental approval, rulebooks and industry-implemented disciplinary procedures, and associated correspondence; the name and address of any person qualified to detect and diagnose a horse that is sore or to otherwise inspect horses for purposes of enforcing the HPA or the management of any horse show, exhibition, sale, or auction; identity of all horses at each event that management disqualified or excused for any reason, including the registered name of each horse and the name and address of the owner, trainer, rider, exhibitor, or other person having custody of or responsibility for the care of each such horse; the exhibitor's number and class number, or the sale or auction tag number of the horse, the name and any applicable registered name and number (if the horse is registered), age, sex, color, and markings of the horse; disciplinary actions taken by the HIO against any exhibitor; photographs and videos depicting inspections conducted by HIO-licensed designated qualified persons; HIO performance evaluations and statistics; and other records required for regulatory purposes under the HPA.

Designated qualified persons records (persons qualified to detect and diagnose a horse that is sore or to otherwise inspect horses for purposes of enforcing the HPA) including, but not limited to, the name, address, other contact information, and license number of each person who applies and/or is licensed to inspect horses in accordance with the HPA and regulations, information related to the disqualification of a person from holding a license to detect soreness in horses, and correspondence, including notice of performance concerns or license cancellation; details of inspections and identity of all horses at each event that the person recommended to management be disqualified or excused for any reason, including the registered name of each horse and the name and address of the owner, trainer, rider, exhibitor, or other person having custody of or responsibility for the care of each such horse; the exhibitor's number and class number, or the sale or auction tag number of the horse, the name and any applicable registered name and number (if the horse is registered), age, sex, color,

and markings of the horse; photographs and videos depicting inspections conducted by designated qualified persons; performance evaluations and statistics; and other records required for regulatory purposes under the HPA.

Compliance and regulatory correspondence records, including, but not limited to, inspection findings, compliance, regulatory and other correspondence, investigations, and enforcements under the HPA, as well as records related to administrative, civil, and criminal litigation; and other records required for regulatory purposes under the HPA.

Complaint records, including, but not limited to, the name and address of a witness or person who has submitted a complaint concerning potential alleged violations and violations by persons who are subject to the HPA and the nature of their complaint.

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

The AWA information is received from the applicant for a license, registration, or permit; the licensee, registrant, or permittee; the attending veterinarian; observations by APHIS inspectors; APHIS Investigative and Enforcement Services officials; or other person responsible for who has information about the humane care of the animals. The HPA information is received from the HIO and other entities that issue licenses; the HIO records submitted to APHIS; the management of the horse show, exhibition, auction, or sale; the horse event management records submitted to APHIS; records submitted to APHIS by persons qualified to detect and diagnose a horse that is sore or otherwise inspect horses for purposes of enforcing the HPA; and the horse owner, trainer, custodian, rider, shipper, carrier, and transporter. Information may also be received from the witness or person who has submitted a complaint concerning potential alleged violations and violations by persons who are subject to the AWA or HPA, and APHIS employee.

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

The information collected is necessary to administer and enforce the AWA and HPA.

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

Information is checked for accuracy through data entry validation and audit reports prior to release to public. Additionally, during 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?**

The Animal Welfare Act (AWA), 7 U.S.C. 2131 *et seq.*, and the regulations issued thereunder, 9 CFR. parts 1 through 4; and the Horse Protection Act (HPA), 15 U.S.C. 1821 *et seq.*, and the regulations issued thereunder, 9 CFR. parts 11 and 12.

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

Cyber-attack on individuals with access to sensitive information in the system is the only risks identified. APHIS has implemented the following safeguards. Access to the restricted portions of the database system requires certain levels of authorization through USDA eAuthentication, which is a system that enables individuals to obtain user-identification accounts with password-protected access to certain USDA Web-based applications and services through the Internet. APHIS personnel who input data must have a high-level eAuthentication account. Persons who apply for a license, registration, or permit or are licensed, registered, or permitted pursuant to the AWA have a lower level eAuthentication account and will only have access to their own records to input certain information. These individuals can also apply for, pay, or check the status of their application for a license, and their license or registration status. HIOs and persons qualified to detect and diagnose a horse that is sore or otherwise inspect horses for purposes of enforcing the HPA will only have access to input certain information in their own records, such as but not limited to information entered in the system by HIOs regarding disciplinary actions taken and information on sore horses that were disqualified or prohibited by management from participating in shows, exhibitions, sales, or auctions. The general public will have read-only access to system generated reports and query results through APHIS' website that contain appropriate redactions to protect personal information.

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

AWA customers submit the information to APHIS via license or registration applications, a Federal debt collection act notice (SSN/EIN sheet), and a credit card payment authorization form. Permit applicants submit the information to APHIS via a permit application. Members of the public and other entities submit to APHIS

complaints on persons engaged in regulated activities. Inspectors collect information during the inspection. HIOs, persons qualified to detect and diagnose a horse which is sore or otherwise inspect horses for purposes of enforcing the HPA, and management of horse events submit the information to APHIS. The information is entered into ACIS 3.0 data entry fields by AC personnel. When the system is updated, persons who seek or hold a license or registration under the AWA will have access to their own records to input certain information. Registered research facilities may directly submit the annual report of animal use under the AWA. They will have access to only their own records. When fully developed, HIOs and persons qualified to detect soreness in horses are also able to input certain information into the system from their own records, but do not have access to other non-public information.

## **2.2 Describe all the uses of information.**

- ACIS 3.0 collects and manages customer data related to licensing, registration, and permitting under the AWA, which are part of the Animal Care collection. The system also collects information from individuals who import dogs into the United States for resale purposes. The system shares research facility annual report of animal use data with efile.
- AC personnel access the customer's address, site address, inspections, animal inventory, and contact phone numbers and other information of the regulated entities. It provides AC personnel with the capability to enter and retrieve licensing, registration, and inspection.
- The system allows Horse Industry Organizations (HIOs) to electronically complete the reporting requirements for the Horse Protection Act (HPA) with data gathered from horse events around the country and serves as a repository for various management reports and business process documentation.
- ACIS 3.0 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.

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

ACIS 3.0 utilizes the Oracle Weblogic framework for the web presentation driven by user roles and using a single interface for authorized users. Oracle Application Express (APEX) and Oracle Business Intelligence Publisher are 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.

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

ACIS 3.0 does not use commercial or publicly available data.

**2.5 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 3.0 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 a personal identity verification (PIV) card.
- 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.
- Individuals that handle PII take USDA Role-based Privacy training.
- Sensitive data such as social security number or tax identification number are encrypted at rest and in transit.
- The laptop has the APHIS approved standard image that is PIV card enabled.
- We placed security controls and proper redaction methods on the inspection reports and research facility annual reports to prevent manipulation of the reports and exposure of 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?**

Paper and electronic records will be retained in accordance with disposition authority NI-463-09-9 which is currently being updated. Some records considered as permanent will be maintained in accordance with NARA requirements.

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

Yes, and we are in the process of updating and ensuring all of the data is approved.

### **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 are no additional risks associated with the length of time the data is retained. Data are maintained and disposed of in accordance with APHIS records retention schedules (except where litigation and other holds apply), 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 3.0 is shared with:

- APHIS Investigative and Enforcement Services and USDA Office of General Counsel to:
  - share inspection findings and generate regulatory correspondence (including information related to the denial or termination of a license, and notices or advisories regarding alleged violations with the AWA, and information regarding compliance- and enforcement-related activities (including copies of pre-litigation settlement agreements, stipulations, and records related to formal administrative enforcement proceedings).
  - Share information on Department-certified HIOs, management of horse shows or other regulated events, and licensed persons who are qualified to detect and diagnose a horse which is sore or otherwise inspect horses for the purposes of enforcing the HPA and the regulations thereunder;
  - Share information regarding any person who is under disqualification and therefore ineligible to participate in a horse event; the identity of all horses that a qualified person recommended to be disqualified or excused for any reason; and generate regulatory correspondence (including information related to the disqualification of a person from holding a license to detect soreness in horses, and notices or advisories regarding alleged violations or violations with the HPA), and information about compliance- and enforcement-related activities (including copies of pre-litigation settlement agreements, stipulations, and records related to formal administrative enforcement proceedings), in accordance with the HPA and regulations and to promote compliance.
- APHIS Legislative and Public Affairs to respond to requests for information to comply with the Freedom of Information Act.
- National Finance Center to process required fees.

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

Animal Care transmits/discloses 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?

Routine uses of records maintained in the system, including categories of users and the purposes of such uses:

In addition to those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act, records maintained in the system may be disclosed outside USDA as follows:

1. APHIS may disclose the name, city, State, license or registration type and/or status, or change of a license or registrant to any person pursuant to 9 CFR 2.38(c) and 2.127;
2. APHIS may disclose annual reports submitted to APHIS by licensees and research facilities to any person pursuant to 9 CFR 2.7 and 2.36;
3. APHIS may disclose inspection reports and other regulatory correspondence issued to licensees and registrants [from the agency] to any attending veterinarian in order to carry out duties under the AWA pursuant to 9 CFR 2.33 and 2.40;
4. APHIS may disclose the name, telephone number, and other contact information, location, inspection reports, and regulatory and other correspondence of licensees, registrants, permittees, and applicants for the same, to appropriate Federal, foreign, State, local, Tribal, or other public authority agencies or officials, in order to carry out duties under the AWA or State, local, Tribal or other public authority on the same subject pursuant to 7 U.S.C. 2145(b);
5. APHIS may disclose inspection reports of licensees and registrants, and permit status, to any pet store or other entity that is required under State, local, Tribal, or other public authority to verify a licensee, registrant, or permittee's compliance with the AWA;
6. APHIS may disclose information to the National Academies of Sciences, Engineering, and Medicine, and any other research institution engaged or approved by the

- Department, to the extent APHIS deems the disclosure necessary to complete research and/or compile a report in furtherance of the Department's mission;
7. APHIS may disclose final adjudicatory AWA and HPA decisions or orders by an appropriate authority to any person;
  8. APHIS may disclose to any person the name, city, and State or other information to the extent necessary for proper identification of persons (referred to as "Designated Qualified Persons" or "DQPs") that are or have been qualified to detect and diagnose a horse that is sore or otherwise inspect horses for purposes of enforcing the HPA and of horse industry organizations or associations (referred to as "HIOs") that have currently or have had in the past DQP programs certified by the USDA;
  9. APHIS may disclose to any regulated horse owner, HIO, and other entities responsible for licensure or required to verify compliance with the HPA, HPA inspection findings and regulatory and other correspondence issued to persons or entities regulated under the HPA;
  10. APHIS may disclose to any person the name, city, and State or other information to the extent necessary for proper identification of any person or entity who has been disqualified, suspended, and/or otherwise prohibited from showing or exhibiting any horse, or judging or managing any horse show, horse exhibition, horse sale, or horse auction under the HPA and the terms of such action;
  11. APHIS may disclose to any person the name, city, and State or other information to the extent necessary for proper identification of any regulated individual or entity whose license or permit has been suspended, revoked, expired, terminated, or denied under the AWA and the terms of such action;
  12. APHIS may disclose to appropriate law enforcement agencies, entities, and persons, whether Federal, foreign, State, local, or Tribal, or other public authority responsible for enforcing, investigating, or prosecuting an alleged violation or a violation of law or charged with enforcing, implementing, or complying with a statute, rule, regulation, or order issued pursuant thereto, when a record in this system on its face, or in conjunction with other records, indicates a violation or potential violation of law, whether civil, criminal, or regulatory in nature, and whether arising by general statute or particular program statute, or by regulation, rule, or court order issued pursuant thereto, if the information disclosed is relevant to any enforcement, regulatory, investigative, or prosecutive responsibility of the receiving entity;
  13. APHIS may disclose to the Department of Justice when the agency, or any component thereof, or any employee of the agency in his or her official capacity, or any employee of the agency in his or her individual capacity where the Department of Justice has agreed to represent the employee, or the United States, in litigation, where the agency determines that litigation is likely to affect the agency or any of its components, is a party to litigation or has an interest in such litigation, and the use of such records by the Department of Justice is deemed by the agency to be relevant and necessary to the litigation; provided, however, that in each case, the agency determines that disclosure of the records to the Department of Justice is a use of the information contained in the records that is compatible with the purpose for which the records were collected;

14. APHIS may disclose information in this system of records to a court or adjudicative body in administrative, civil, or criminal proceedings when: (a) The agency or any component thereof; or (b) any employee of the agency in his or her official capacity; or (c) any employee of the agency in his or her individual capacity where the agency has agreed to represent the employee; or (d) the United States Government, is a party to litigation or has an interest in such litigation, and by careful review, the agency determines that the records are to be for a purpose that is compatible with the purpose for which the agency collected the records;
15. APHIS may disclose information from this system of records to appropriate agencies, entities, and persons when: (a) USDA suspects or has confirmed that there has been a breach of the system of records; (b) USDA has determined that as a result of the suspected or confirmed breach there is a risk of harm to individuals, USDA (including its information systems, programs, and operations), the Federal Government, or national security; and (c) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with USDA's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm;
16. APHIS may disclose information from this system of records to another Federal agency or Federal entity, when the USDA determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in (a) responding to a suspected or confirmed breach or (b) preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity (including its information systems, programs, and operations), the Federal Government, or national security, resulting from a suspected or confirmed breach;
17. APHIS may disclose information in this system of records to USDA contractors and other parties engaged to assist in administering the program, analyzing data, developing information management systems, processing Freedom of Information Act requests, and conducting audits. Such contractors and other parties will be bound by the nondisclosure provisions of the Privacy Act;
18. APHIS may disclose information in this system of records to USDA contractors, partner agency employees or contractors, or private industry employed to identify patterns, trends, or anomalies indicative of fraud, waste, or abuse;
19. APHIS may disclose information in this system of records to a Congressional office from the record of an individual in response to any inquiry from that Congressional office made at the written request of the individual to whom the record pertains;
20. APHIS may disclose information in this system of records to the National Archives and Records Administration or to the General Services Administration for records management activities conducted under 44 U.S.C. 2904 and 2906; and
21. APHIS may disclose information in this system of records to the Treasury Department as necessary to carry out any and all functions within their jurisdiction, including but not limited to, processing payments, fees, collections, penalties, and offsets.

**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. The routine uses is covered in the SORN Animal Welfare Act and Horse Protection Act USDA/APHIS-8, pending final approval on the amended SORN.

**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. Public accesses the APHIS website to search for the read-only display of ACIS 3 data and information, with appropriate redactions to protect personal information.

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

Persons may attempt to manipulate the computer generated inspection reports and research facility annual reports to reveal PII. We placed security controls and proper redaction methods on the documents to prevent manipulation of the reports and exposure of PII.

## 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. The public was provided notice in the SORN USDA/APHIS-8 published in the *Federal Register*, pending final approval of the amended SORN. Information is collected on approved APHIS forms, which all forms contain paperwork reduction act statements as required by the paperwork reduction act (PRA). The forms contain a privacy act notice, pending final approval of the Privacy Impact Assessment and the SORN. The forms include: APHIS 7001 US Interstate and International Certificate of Health Examination for Small Animals; APHIS 7001a Continuation sheet for US Interstate and International Certificate of Health Examination for Small Animals; APHIS 7002 Animal Care Program of Veterinary Care for Research Facilities or



Exhibitors/Dealers; APHIS 7003 Application for License Renewal; APHIS 7003A Application for New License; APHIS 7005 Record of Acquisition for Dogs and Cats on Hand; APHIS 7006 Record of Disposition of Dogs and Cats; APHIS 7006a Continuation Sheet for Record of Disposition of Dogs and Cats; APHIS 7007-License Certificate; APHIS 7008-USDA-AC Inspection Report and Narrative; APHIS 7010-Itinerary with Overnight Travel; APHIS 7010a-Itinerary with Overnight Travel Continuation; APHIS 7011 Application for Registration Update; APHIS 7011A Application for New Registration; APHIS 7019 Record of Animal on Hand; APHIS 7020 Record of Acquisition, Disposition, or Transport of Animals (other than dogs and cats); APHIS 7020a Continuation Sheet for Record of Acquisition, Disposition, or Transport of Animals (other than dogs and cats); 7021-Registration Certificate; APHIS 7023 Research Facility Annual Report; APHIS 7023a Continuation Sheet for Annual Report of Research Facility; APHIS 7023B-Column E Explanation; APHIS 7023c-Site Specific Annual Report of Research Facility; APHIS 7030 Federal Debt Collection Act form; APHIS 7031-Credit Card Payment Authorization; APHIS 7033-Notification of Change; APHIS 7040-Live Dog Import Application and Permit; APHIS 7040B- Live Dog Import Application Permit Additional Information; APHIS 7041-Live Dog Import Health and Rabies Certificate; APHIS 7060-Official Warning Violations of Federal Regulations, APHIS 7077 USDA, APHIS, Summary of Alleged Violations (Horse Protection Act);.

**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?**

No because the information is used to determine compliance with the AWA and HPA.

**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 (SORN) Animal Welfare Act and Horse Protection Act USDA/APHIS-8 is the official notice. The forms contain a privacy act notice, pending final approval of the Privacy Impact Assessment and the SORN. At the time of data collection, a form is being completed or the individual is speaking with a Federal employee.

---

## 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?**

The Agency has exempted this system of records from the notification, access, and amendment provisions of the Privacy Act. The Agency has exempted this system from subsections (c)(3); (d); (e)(1), (4)(G), (H), and (I); and (f) of the Privacy Act pursuant to 5 U.S.C. § 552a(k)(2). The exemptions will be applied only to the extent that the information in the system is subject to exemption pursuant to 5 U.S.C. § 552a(k)(2). An individual who is the subject of a record in this system may seek access to those records that are not exempt from the access provisions. A determination whether a record may be accessed will be made at the time a request is received. All inquiries should be addressed to the Chief FOIA Officer, Department of Agriculture, 1400 Independence Avenue, SW, Washington, D.C. 20250.

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

Individuals seeking to contest or amend information maintained in the system should direct their requests to the address indicated in section 7.1 above. Some information may be exempt from the amendment provisions, as described in section 7.1 above. An individual who is the subject of a record in this system may seek amendment of those records that are not exempt. A determination whether a record may be amended will be made at the time a request is received.

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

Individuals are notified of procedures for correcting their information in the USDA/APHIS-8 SORN that is currently published in the Federal Register, pending final approval of the amended SORN.

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

Individuals seeking to contest or amend information maintained in the system should direct their requests to the address indicated in section 7.1 above. Some information may be exempt from the amendment provisions, as described in section 7.1 above. An individual who is the subject of a record in this system may seek amendment of those

records that are not exempt. A determination whether a record may be amended will be made at the time a request is received.

**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.

## **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 3.0 is based on the need to conduct business with Animal Care. Access must be requested in writing and approved by Animal Care Information System Security Manager (ISSM).

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

Yes Department contractors have access to ACIS 3.0.

**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 3.0 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.

Individuals that handle PII take USDA Role-based Privacy training.

All non-APHIS users (customers) are required to read the eAuth login screen before they login to input data into ACIS 3.0.

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

Yes. \*Note that Assessment and Authorization (A&A) on ACIS is completed and it is on a continuous monitoring requiring an A&A review annually.

### **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 3.0 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 3.0 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 via the USDA eAuthentication system. Internal users login to the application using their PIV card and external users login with their eAuthentication account and password.

### **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 3.0 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 3.0 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 3.0 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 3.0 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 3.0 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 3.0 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 3.0 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 3.0 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 3.0 does not use 3<sup>rd</sup> party websites or applications.

## Approval Signature

**ELIZABETH  
GOLDENTYER**

Digitally signed by ELIZABETH  
GOLDENTYER  
Date: 2019.02.20 16:28:08 -05'00'

---

Betty Goldentyer  
System Owner  
Animal Control Information System (ACIS 3.0)  
Animal Plant Inspection and Service (APHIS)  
United States Department of Agriculture

---

Preston Griffin  
MRP ISSPM  
APHIS Marketing and Regulatory Programs Business Services (MRPBS)  
United States Department of Agriculture

**TONYA WOODS** Digitally signed by TONYA WOODS  
Date: 2019.02.20 16:43:58 -05'00'

---

Tonya Woods  
APHIS Privacy Act Officer  
Animal Plant Inspection and Service (APHIS)  
United States Department of Agriculture