APHIS

Animal and Plant Health Inspection Service (APHIS)

Privacy Impact Assessment

Phytosanitary Certificate Issuance & Tracking (PCIT)

Revision: 1.3

United States Department of Agriculture

Date: December 2009

Document Information

Owner Details	
Name	Alison Young
Contact Number	301-734-3821
E-mail Address	Alison.i.young@aphis.usda.gov

Document Revision and History			
Revision	Date	Author	Comments
1.0	January 2009	EDS USDA PCIT Team	Updated for the FY09 C&A using the APHIS Template.
1.1	May 2009	EDS USDA PCIT Team	Modified per questions
1.2	September 2009	EDS (HP) USDA PCIT Team	Updated per July 2009 review
1.3	December 2009	EDS (HP) USDA PCIT Team	Updated per December 2009 review

Distribution List			
Name	Title	Agency/Office	Contact Information
Darlene Rush	PCIT ISO Project Manager/COTR	USDA/APHIS/PPQ/ITDC	301-734-5255 Darlene.D.Rush@aphis.usda.gov

Table of Contents

1 System Information

System Information	
Agency:	United States Department of Agriculture
System Name:	Phytosanitary Certificate Issuance & Tracking
System Type:	☒ Major Application ☐ General Support System ☐ Non-major Application
System Categorization (per FIPS 199):	☐ High ☒ Moderate ☐ Low
Description of System:	The PCIT Web Application facilitates the creation and processing of plant export applications (OMB form 572) with the intention of generating an export certificate (OMB 577, 578, 579). The export certificate, known as the Federal Phytosanitary Certificate, is created to allow the entry of plants or plant products into a foreign country. The certificate certifies to the foreign plant protection service that the shipment has been inspected and was found to conform to the phytosanitary import requirements of that country. In addition, the certificate attests that the shipment is appropriately treated for or free from quarantine plant pests and pathogens and is practically free from other injurious pests.
Who owns this system? (Name, agency, contact information)	Alison Young, USDA/APHIS/PPQ ITDC, Branch Chief 4700 River Road Riverdale, MD 20737-1228 Alison.I.Young@aphis.usda.gov 301-734-3821

System Information (Continued)	
Who is the security contact for this system? (Name, agency, contact information)	Carl Remalia, Jr, USDA APHIS PPQ ITDC, ISSM, Security 4700 River Road Riverdale, MD 20737 Carl.Remalia@aphis.usda.gov 301-734-0928
Who completed this document? (Name, agency, contact information)	Darlene Rush, USDA APHIS PPQ ITDC, PCIT ISO 4700 River Road Riverdale, MD 20737 Darlene.d.rush@aphis.usda.gov 301-734-5255

2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	INDUSTRY: Exporters will enter information to create an application for the export of agricultural goods to foreign countries. The information entered includes consignee, commodities, and destination country. The exporter only has visibility into their organization's information. OFFICIALS: Data to complete certificate process including additional declarations, and product treatments.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	☐ Yes ☒ No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	
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.	☒ Yes ☐ No
4	Sources of the data in the system.	Industry: information provided by exporter on commodities to be shipped. Federal, State and Local Officials: information needed to certify shipment. NO PERSONAL DATA
4.1	What data is being collected from the customer?	Industry: Exporters will enter information to create an application for the export of agricultural goods to foreign countries. The information entered includes consignee, commodities, and destination country. The exporter only has visibility into their organization's information. The exporter will enter information about their organization - company name, address, and phone number.

No.	Question	Response
4.2	What USDA agencies are providing data for use in the system?	APHIS/PPQ verifies the reference tables in the PCIT database. Grain inspections are performed by GIPSA on behalf of APHIS PPQ. GIPSA provides the information in hardcopy format for entry into the system by PPQ certified officials. Other data is dependent on the specific information provided by users. APHIS/PPQ users would specifically enter inspection and treatment information. Access to PCIT requires an eAuthentication (eAuth) account. eAuth supplies a certification ID (CID) for users accessing the PCIT. Pay.gov receives financial information from industry users thru a directly link to Pay.gov, that does not go thru PCIT. Once Pay.gov accepts the transaction, it sends PCIT a message confirming the action, which contains information to identify the organization in PCIT and the amount of the transaction.
4.3	What state and local agencies are providing data for use in the system?	State and County cooperators (who are certified officials), enter inspection, treatment information and issue certificates. These are accredited officials that provide a service to the industry exporters on behalf of the Federal Government.
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.	☒ Yes ☐ No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Reference tables are being used. Additionally, edit checks are available on data fields when possible. NO PERSONAL DATA.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Automated edit checks at the field level and a final check on the application to be submitted when the user signifies the application is complete. Additionally, checks for completeness are included in the actual issuance of the certificate by the certified official to ensure applicable information has been captured.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Automated edit checks at the field level and a final check on the application to be submitted when the user signifies the application is complete. Additionally, checks for completeness are included in the actual issuance of the certificate by the certified official to ensure applicable information has been captured.

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?	The data collected is for the creation of Phytosanitary certificates needed to export plant products outside the US. NO PERSONAL DATA.
7	Will the data be used for any other purpose?	☒ Yes ☐ No – If NO, go to question 8.
7.1	What are the other purposes?	The application and certificate data consisting shipment data of commodities; commodity quantities; destination countries and other related data will be important in tracking national export activities and help in predicting market trends in the future. No individual activities or user data is tracked.
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	☒ Yes ☐ No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	☐ Yes ☒ No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	☐ Yes ☐ No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	☐ Yes ☐ No
9.3	How will the new data be verified for relevance and accuracy?	

No.	Question	Response
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	(a) Evaluate application data and issue phytosanitary certificates (b) Schedule and perform inspections, investigations, and phytosanitary related activities (c) Generate phytosanitary certificates (d) Generate reports to evaluate quality control and effectiveness of the program NO PERSONAL DATA
11	Will the data be used for any other uses (routine or otherwise)?	☐ Yes ☒ No – If NO, go to question 12.
11.1	What are the other uses?	.
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	☒ Yes ☐ No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	Information is accessible based on organization and role. Only information within their purview is available for a user to see. External users' access is limited by the organization to which they belong. Only information within their organization is available to them. Each user must be enrolled thru USDA e-authentication; the system runs at NITC within the physical and logical infrastructure provide which includes requites firewalls and intrusion detection processes. NO PERSONAL DATA
13	Are processes being consolidated?	☐ Yes ☒ No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	☐ Yes ☒ No – If NO, go to question 15. Currently all data entered in PCIT will be retained. A future release of PCIT will include archiving of data. POA&M 11079 has been established.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	Data retention requirements for the Export Application is 4 years. Data retention requirements for the Phytosanitary Certificate is 2 years.
14.2	What are the procedures for purging the data at the end of the retention period?	POA&M 11079 has been established to address this issue.
14.3	Where are these procedures documented?	POA&M 11079 has been established to address this issue.
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	The requirements for determining if the data is sufficiently accurate, relevant, timely and complete are built into the system design. Once data is entered and complete the data cannot be changed. There will always be a record of the original data entered. However, the user can update data by issuing a new certificate.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	☒ Yes ☐ No

2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	☒ Yes ☐ No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	Only those State and County cooperators with roles in issuance of phytosanitary certificates will have access to data within their organizations. It is expected that in the future, viewing of specific country certificate information by the applicable foreign government will be possible in support of electronic certificate issuance requirements.
17.2	Who is responsible for assuring the other agency properly uses the data?	APHIS/PPQ
18	Is the data transmitted to another agency or an independent site?	☒ Yes ☐ No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	Yes
19	Is the system operated in more than one site?	☐ Yes ☒ No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	

2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Users, internal and external, have access to their own organization's information through the rights that are set up for them. Developers have access to the data for help desk support. This includes administration of the PCIT system.
21	How will user access to the data be determined?	Users have specific rights based on their role in the export system. These roles are verified by export services and the specific organization they belong to within PCIT. A user can gain access only after the administrator of their organization indicates that the user can belong to the organization. Developers and customer support personnel have specific procedures, including scripts, for viewing and updating database tables.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	☒ Yes ☐ No
22	How will user access to the data be restricted?	As previously noted, access to data is limited by role and organization. Users only have access to information regarding their own organizations.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	☒ Yes ☐ No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	☒ Yes ☐ No

2.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	There are no privacy data within PCIT. Data is accessible by organization and role within organization. Physical security is controlled by NITC with scheduled backups and a redundant DR facility. Data responsibility is that of USDA/APHIS/PPQ.

No.	Question	Response
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	PCIT does not contain personal information. eAuth will protect user ID information. PCIT receives the CID which is used to identify the user. Pay.gov is responsible for protecting user financial information as none of that data is stored in PCIT. PCIT provides a direct link to Pay.gov; pay.gov provides PCIT with a confirmation of the transaction. Requests concerning data can be forwarded to USDA/APHIS/PPQ/PIM.
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	☒ Yes – If YES, go to question 27. ☐ No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: • Consolidation and linkage of files and systems • Derivation of data • Accelerated information processing and decision making • Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	☐ Yes ☒ No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	PCIT is a centralized web based application so all users will be using the same system. Priority of work is presented based on system timestamps and customer specified dates when the commodity is available for inspections. All inspections by officials are handled by the local duty station. All users are part of an organization and assigned roles by their organization administrator.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	☐ Yes ☒ No – If NO, go to question 30
29.1	Explain	

3 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	☒ Yes ☐ No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	All users of the system have a unique CID created by eAuth. The CID is connected in a first time process to the person record in PCIT. The person record identifies a person and is linked to roles and an organization. No personal information is collected in the application. Based on the organization and role, the user has access to that data. Each user is uniquely identified in PCIT as describe based on the e-auth CID and internal PCIT identifier. No personal data is collected.
30.2	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.)	APHIS is preparing a system of records notice for this system. SORs can be viewed at www.access.GPO.gov The POA&M ID is 11024.
30.3	If the system is being modified, will the SOR require amendment or revision?	☐ Yes ☒ No

4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	☐ Yes ☒ No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	

5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.

Privacy Impact Assessment Authorization

Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Phytosanitary Certificate Issuance & Tracking (PCIT)
(System Name)

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

_____   _____1/13/10_____
System Manager/Owner   Date
OR Project Representative
OR Program/Office Head.

_____   _____March 26, 2010_____
Agency's Chief FOIA officer   Date
OR Senior Official for Privacy
OR Designated privacy person

_____   _____1-21-10_____
APHIS ISSPM   Date

_____   _____March 30, 2010_____
Agency OCIO   Date