U.S. DEPARTMENT OF AGRICULTURE

PRIVACY IMPACT ASSESSMENT

VERSION 1.4

OFFICE OF THE CHIEF PRIVACY OFFICER





Privacy Impact Assessment for the USDA IT System/Project:

Management Information System 2000

(MIS2000)

Wildlife Services

MRP

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Abstract

The Management Information System 2000 (MIS 2000) is an internal management application that serves as the case management system to track and monitor the progress of Wildlife Services' (WS) wildlife damage management projects. WS implemented MIS 2000 to document and track the status and progress of wildlife management projects, monitor and measure wildlife program performance and provide timely information to decision makers regarding wildlife projects and activities. MIS 2000 collects the name, address, email address, phone number, GPS location and signature of the cooperators and owners of properties where wildlife damage management services are being conducted. This information is collected in order to obtain their consent to carry out Wildlife Services activities on their properties and to communicate with them and update them on the activities that are being carried out.

Overview

APHIS protects the health of U.S. agriculture and natural resources against invasive pests and diseases, regulates genetically engineered crops, administers the Animal Welfare Act, and helps people and wildlife coexist.¹

Wildlife Services (WS) is a non-regulatory program within APHIS. The mission of WS is to provide Federal leadership in managing problems caused by wildlife. WS recognizes that wildlife is an important public resource greatly valued by the American people. By its very nature, however, wildlife is a highly dynamic and mobile resource that can damage agricultural and industrial resources, pose risks to human health and safety, and affect other natural resources. The WS program carries out the Federal responsibility for helping to solve problems that occur when human activity and wildlife conflict with one another.³

Program biologists apply the integrated wildlife damage management approach to provide technical assistance and direct management operations in response to requests for assistance. To provide direct management, WS enters into funded cooperative service agreements with federal and state agencies, counties, livestock producers, other agricultural producer groups, institutions, businesses, and individuals (collectively referred to as cooperators) to develop integrated wildlife damage management work plans.

IT Management of Wildlife Services

¹ Reference, link <u>USDA APHIS | Mission</u>

³ Reference, link USDA APHIS | WS Vision, Mission and Goals

WS implemented MIS 2000 to track the status and progress of projects, monitor and measure program performance, provide timely information to decision makers, and better document WS work. MIS 2000 is an internal management application for WS personnel. MIS 2000 allows WS to monitor wildlife damage management efforts, provide administrative records and reports to decision makers, and document APHIS WS work. The Animal Damage Control Act (7 U.S.C. 8351 to 8356), and the Fish and Wildlife Coordination Act (16 U.S.C. 667) authorize the collection of the information that MIS2000 processes.

MIS 2000 is the official record of WS' work in wildlife damage management activities. MIS is especially important for record keeping for work in several areas of wildlife damage management related to agriculture, human health and safety, natural resources, and property. These areas include, but are not limited to, wildlife disease surveillance, airport wildlife hazard mitigation, invasive species management, livestock protection, blackbird damage management, and aquaculture protection.

In MIS 2000, WS personnel enter daily fieldwork tasks and time spent on each work site or project. Once fieldwork data is entered, supervisors can review work tasks from a remote location and make personnel or resource management decisions. MIS 2000 project data is reviewed annually by WS administrative personnel at state and national levels for accuracy and compliance with program rules, applicable laws, and wildlife regulations.

PII Collected, Used, Maintained, and Disclosed

PII is entered into MIS 2000 during the initiation and renewal of a wildlife damage management project. PII records are required to document the cooperator's consent to allow WS to begin wildlife damage management on specified properties on behalf of the cooperator. Contacts and location information is necessary to carry out the work and report progress or issues back to the cooperator or landowner.

The information collection process is initiated when the WS employee and cooperator complete and sign the WS Form 12A, *Work Initiation Document for Wildlife Damage Management* (OMB 0579-0335). The WS Form 12A collects information about the cooperator and/or their representative. PII collected includes full name, address, email, phone number and signature. Other information collected includes the property in question, background information on the wildlife conflict, protected resources, and methods and tools agreed upon by the cooperator and the employee conducting direct control. The GPS location of the property is obtained from google maps and entered into MIS 2000. The PII of approximately 1,500 individuals is collected each year. The information is used to track the location of the wildlife damage management projects and to obtain consent from and communicate with the cooperators and/or owners of properties where the projects are occurring.

WS uses information from MIS 2000 to generate wildlife damage management reports. MIS 2000 reports are prompted by user inputs to generate spreadsheets based on the project site, date ranges, species involved, and methods applied. Reports or data queries facilitate information internally for decision makers and externally for interested parties. System generated reports do not disclose PII or distinguishable private property locations.

There are no systems interconnected with MIS 2000. WS may manually share MIS 2000 information with the USDA Office of the General Counsel (OGC) during investigations. Only



current WS employees or necessary administrators have access to the MIS 2000 system. PII is not shared externally outside of the USDA.

Section 1.0 Authorities and Other Requirements

The following questions are intended to identify all statutory and regulatory authority for operating the project, including the authority for collection, what SORN applies, if an ATO has been completed and if there is Paperwork Reduction Act coverage.

1.1. What legal authorities and/or agreements permit the collection of information by the project or system?

The Animal Damage Control Act (7 U.S.C. 8351 to 8356), and the Fish and Wildlife Coordination Act (16 U.S.C. 667) authorize officers, agents, and employees of the USDA APHIS WS to conduct a program of wildlife services and to enter into agreements with States, local jurisdictions, individuals, and public and private agencies, organizations, and institutions for the purpose of conducting such services.

1.2 Has Authorization and Accreditation (A&A) been completed for the system?

Yes. ATO was last renewed 9/29/2023. All documents were updated, finalized, and signed at that time. The FIPS classification is Moderate.

1.3. What System of Records Notice(s) (SORN(s)) apply to the information?

APHIS-9 - 2015-25640.pdf (govinfo.gov)

1.4. Is the collection of information covered by the Paperwork Reduction Act?

Yes, Form 12A, *Work Initiation Document for Wildlife Damage Management* (OMB 0579-0335) is used to collect information from cooperators.

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and collected as well as the reasons for its collection as part of the program, IT system, or technology being developed.

2.1. What information is collected, used, disseminated, or maintained in the system/program?



PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Mark all applicable PII and data elements in the table.

Please check any information listed below that your system collects, uses, disseminates, creates, or maintains. If additional sensitive PII is collected, used, disseminated, created, or maintained, please list those in the text box below:

Identifying Numbers								
	Social Security number				Truncated or Partial Social Security number			
	Driver's License Numbe	r		License Plate Number				
	Registration Number			File/Case ID Number				
	Student ID Number				Federal Student Aid Number			
	Passport number			Alien Registration Number				
	DOD ID Number		1	DOD Benefits Number				
	Employee Identification	Numbe		Professional License Number				
	Taxpayer Identification			Business Taxpayer Identification Number (sole proprietor)				
	Credit/Debit Card Numl	ber		Business Credit Card Number (sole proprietor)				
	Vehicle Identification Number				Business Vehicle Identification Number (sole proprietor)			
	Personal Bank Account Number				Business Bank Account Number (sole proprietor)			
	Personal Device Identifiers or Serial Numbers				Business device identifiers or serial numbers (sole proprietor)			
	Personal Mobile Number				Business Mobile Number (sole proprietor)			
	Health Plan Beneficiary	Numbe	r	1				
Biographical Information								
\boxtimes	Name (including nicknames)				Business Mailing Address (sole proprietor)			
	Date of Birth (MM/DD/YY)		Ethnicity		Business Phone or Fax Number (sole proprietor)			
	Country of Birth		City or County of Birth		Group/Organization Membership			
	Citizenship		Immigration Status		Religion/Religious Preference			
\boxtimes	Home Address		Zip Code		Home Phone or Fax Number			
	Spouse Information				Children Information			
	Marital Status		Military Service Information		Mother's Maiden Name			
	Race		Nationality		Global Positioning System (GPS)/Location Data			
\boxtimes	Personal e-mail address	⊠	Business e-mail address		Personal Financial Information (including loan information)			
	Employment Information		Alias (username/screenname)		Business Financial Information (including loan information)			
	Education Information		Resume or curriculum vitae		Professional/personal references			
Biometrics/Distinguishing Features/Characteristics								



	Fingerprints		Palm prints		Vascular scans			
	Retina/Iris Scans		Dental Profile		Scars, marks, tattoos			
	Hair Color		Eye Color		Height			
	Video recording		Photos		Voice/ Audio Recording			
	DNA Sample or		Signatures		Weight			
	Profile	\boxtimes						
		—						
		Me	lical/Emergency Inform	ation				
	Medical/Health		Mental Health Information		Disability Information			
	Information				-			
	Workers'		Patient ID Number		Emergency Contact Information			
	Compensation Information							
			Device Information					
	Device settings or		Cell tower records (e.g., logs,		Network communications data			
	preferences (e.g.,		user location, time, etc.)					
	security level, sharing options, ringtones)							
Specific Information/File Types								
	Personnel Files		Law Enforcement Information		Credit History Information			
	Health Information		Academic/Professional		Civil/Criminal History			
	0 61		Background Information		Information/Police Record			
	Case files		Security Clearance/Background Check		Taxpayer Information/Tax Return Information			

2.2. What are the sources of the information in the system/program?

The names, phone numbers, email addresses, addresses and signatures are obtained directly from the cooperators and/or property owners who request wildlife management services.

2.2.1. How is the information collected?

The names, phone numbers, email addresses, addresses and signatures are collected by a WS employee from the person seeking services, or from an authorized representative, employee, owner, manager, or executor of that person. WS employees gather information from these individuals verbally in person, via email or by mail via WS form 12A (OMB 0579-0335).

2.3. Does the project/program or system use information from commercial sources or publicly available data. If so, explain why this is used?



WS will sometimes use public tax records to understand who owns a particular property where a wildlife event is occurring, as well as the mailing address of the property owner in order to communicate with them. In these cases, the WS employee may pre-fill WS form 12A with this information. The property owners confirm their information, and correct it if needed, on WS form 12A. WS also uses the GPS coordinates publicly available on Google Maps in order to more accurately pinpoint the location of WS activities.

2.4. How will the information be checked for accuracy? How often will it be checked?

After filling out the Work Initiation Document for Wildlife Damage Management Form (12A), APHIS WS sends back the form to the cooperators and/or landowners to review for accuracy. After the cooperators and/or landowners review their information and sign the form, the APHIS WS employees enter the data into MIS 2000. Field work data is checked for completeness by the APHIS WS employee who enters it. Additionally, the data is reviewed by a second WS employee before being "approved" in the system. Additionally, the system enforces required fields to be filled in. Data is again reviewed for accuracy by supervisors at the APHIS WS district and state levels.

2.5. Does the system/program use third-party websites?

No

2.5.1. What is the purpose of the use of third-party websites?

N/A

2.5.1.1. What PII will be made available to the agency though the use of third-party websites?

N/A

2.6. PRIVACY IMPACT ANALYSIS: Related to Characterization of the Information.

<u>**Privacy Risk</u>**: There is the privacy risk that MIS 2000 is collecting more information than is necessary to support its mission, and that information will be used outside of its original purpose.</u>

Mitigation:



WS designed MIS 2000 specifically to collect and store only the information that is necessary to track the work performed by WS. The APHIS Privacy Office reviews each form during the development and revision process to ensure that only the minimum amount of information is collected to support wildlife damage management services. APHIS WS requires the information collected to identify the point of contact for engagement and contact purposes. All data elements collected are negotiated with and approved by the Office of Management and Budget (OMB) during Paperwork Reduction Act collection review. Furthermore, APHIS WS designed MIS 2000 to collect and store only the information that is necessary to track the project plan as outlined in the agreement established between the cooperator and WS. MIS2000 collects PII directly from the individuals.

Section 3.0 Uses of the Information

The following questions are intended to clearly delineate the use of information and the accuracy of the data being used.

3.1. Describe why and how the information collected, used, disseminated and/or maintained will support the program's business purpose?

The contact information of landowners and cooperators is used to obtain their consent to carry out WS activities on their properties. It is also used to communicate with them and update them on the activities that are being performed. The GPS locations of the properties are used to understand the specific locations in the field where Wildlife Services activities are taking place. The GPS location allows for more accurate and granular location information than address information.

3.2. Does the system/project/program use technology to conduct electronic searches, queries, or analysis in an electronic database to discover or locate a predictive pattern or anomaly? If so, state how USDA plans to use such results.

No

3.3. PRIVACY IMPACT ANALYSIS: Related to uses of the information.

<u>**Privacy Risk</u>**: There is a risk that information may be used outside of the original purpose collection, which is to assist the cooperator with wildlife conflicts. There is also the risk of unauthorized access to the data.</u>

<u>Mitigation</u>: Only users who are authenticated and designated as active are permitted access to MIS2000. Access privileges are determined by role-based or feature-based access control, which specifies what actions users can perform within the system. These access rights are assigned based on the specific responsibilities of each individual.



To obtain an MIS2000 account, users must utilize their e-Authentication credentials. Initially, users complete the UMS access request form, specifying their Agency, Role, System, and Reporting requirements communicated to the user from their supervisor. This form is then reviewed and approved by the user's supervisor and the MIS2000 business owner's representative. Access is only granted to the system if the user needs it to perform their job duties.

Information collected on the benefit request forms is used only to assist with wildlife damage management and for no other purpose. APHIS WS, in the course of the project activities, may identify noncompliance and public safety concerns. APHIS WS has a statutory requirement to protect the privacy of both its cooperators and employees. These uses are consistent with the purpose of collection for wildlife damage management, and consistent with overall APHIS mission to preserve the health and integrity of the agriculture system. The System of Record Notice (SORN) describes the purposes of the collection of the information. All records are protected from unauthorized access and use through appropriate administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a need-to-know. For example, data reports are completed by request from WS supervisory staff or other entities who have requested such information through official channels. Such information is purged of any PII and is checked to ensure that outputs do not point to private individuals or their information. Data Queries are used only by those who have been approved by the MIS 2000 administrative board (System Owner, Business Owner, System Administrator).

Section 4.0 Notice

The following questions are directed at providing notice to the individual of the scope of information collected, the right to consent to uses of the information, and the right to decline to provide information.

4.1. How does the project/program/system provide notice to individuals prior to collection?

Cooperators engaging with APHIS WS for wildlife damage management services are presented with a Privacy Act Statement when they review and submit their information on form 12A. Additionally, individuals are provided general notice through the publication of this PIA and the existing Wildlife Services Management Information SORN.

4.2. What options are available for individuals to consent, decline, or opt out of the project?

The cooperator requests for wildlife damage management from WS is voluntary, and they therefore can choose to consent or not. If they do choose to submit a request, all the information



that WS collects is necessary to carry out the wildlife activities, so individuals cannot choose to submit a subset of information. However, if they choose not to consent, WS will not be able to conduct any operational activities or services on their behalf. By signing the cooperative agreement, the cooperator authorizes APHIS WS to collect information necessary for wildlife damage management activities under the statutory authority and as listed in the SORN (APHIS-9). Cooperators at any time can terminate the cooperative agreement and decline to provide information.

4.3. PRIVACY IMPACT ANALYSIS: Related to Notice

<u>**Privacy Risk**</u>: There is a risk that a cooperator may not be aware that their information is stored in MIS 2000 or how it is processed.

<u>Mitigation</u>: This risk is reduced by APHIS WS providing notice to individuals through the cooperative agreements, Privacy Act Statement at the time of data collection, this PIA, and the associated SORN. This PIA and the SORN describe what information is collected from individuals, how it is used and the process for individuals to gain access to or correct their information. WS only uses the information for the purposes stated to ensure PII is only used for its intended purpose, all users take annual training on privacy. System access and changes are also logged.

Section 5.0 Data Retention

The following questions are intended to outline how long information will be retained after the initial collection.

5.1. What information is retained and for how long?

APHIS has developed record retention schedules, but until they are approved by NARA, electronic systems are classified as permanent in accordance with unscheduled records management policy.

5.2. Has the retention schedule been approved by the USDA records office and the National Archives and Records Administration (NARA)? If so, please indicate the name of the records retention schedule.

The retention schedule is currently pending NARA approval.

5.3. PRIVACY IMPACT ANALYSIS: Related to retention of information.



<u>Privacy Risk</u>: There is an inherent risk that PII is retained longer than necessary to fulfill specified purposes.

<u>Mitigation</u>: The proposed APHIS WS retention period is consistent with the concept of retaining data only for as long as necessary to support WS's core functions. The proposed retention schedule is 5 years after cutoff date, which is based upon a need to keep the records available in case there are any follow up requests for further information on a project. The proposed schedule complies with the requirements of the Federal Records Act and the stated purpose and mission of APHIS WS. Until the National Archives and Records Administration formally approves the proposed records schedule, all records will be retained indefinitely. To mitigate the privacy risks of inadvertent access and disclosure, APHIS WS implemented least privilege access, authentication requirements, and periodic access reviews controls to safeguard the information in MIS 2000. WS personnel only have access to cases they are assigned to perform on a particular project or property. When the project is complete, or services are no longer required, WS personnel are no longer able to access the case. Additionally, only the minimum amount of information is collected to carry out its intended purposes.

Section 6.0 Information Sharing

The following questions are intended to define the content, scope, and authority for information sharing.

6.1. With which internal organizations and/or systems is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

Access to MIS2000 is limited to WS personnel as well as specific IT personnel to resolve software issues as well as other routine uses identified in the SORN APHIS-9. Additionally, WS generates reports for the USDA Office of General Counsel (OGC) if it pertains to a legal process or litigation actions associated with WS' wildlife damage management activities. In these cases, PII may include the name, address, phone and email address, depending on the case. The transmission is via internal USDA encrypted e-mail and does not leave the network.

6.2. PRIVACY IMPACT ANALYSIS: Related to internal sharing and disclosure.

<u>**Privacy Risk**</u>: There is a risk that MIS 2000 may be accessed by personnel from other internal mission areas without a need-to-know and may be used for purposes incompatible with the original purposes.

<u>Mitigation</u>: This risk is mitigated through administrative, physical, safeguards, that include limiting access to only current WS personnel. Each data query is independently evaluated to ensure the recipient has a valid need to know by legal authority and ensuring the disclosure is

compatible with the original purposes of collection. All data is securely and directly transmitted to the authorized recipient or their official agents via encrypted email.

6.3. With which external organizations (outside USDA) is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

Information shared externally is consistent with the routine uses identified in the System of Record Notice USDA-APHIS-9 Wildlife Services Management Information System.

6.4. PRIVACY IMPACT ANALYSIS: Related to external sharing and disclosure.

<u>Privacy Risk</u>: There is a risk that information will be compromised during external sharing transmission. Only the minimum amount of PII is shared to satisfy the regulatory requirements.

Mitigation: Encryption is used when emailing PII externally.

Section 7.0 Redress

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about him or her.

7.1. What are the procedures that allow individuals to gain access to their information?

All requests for access to records must be in writing and should be submitted to the APHIS Privacy Act Officer, 4700 River Road Unit 50, Riverdale, MD 20737; or by facsimile ((301) 734-5941); or by email (APHISPrivacy@usda.gov). In accordance with 7 CFR part 1, subpart G, § 1.112 (Procedures for requests pertaining to individual records in a record system), the request must include the full name of the individual making the request; the name of the system of records; and preference of inspection, in person or by mail. In accordance with 7 CFR 1.113, prior to inspection of the records, the requester shall present sufficient identification to establish that the requester is the individual to whom the records pertain. In addition, if an individual submitting a request for access wishes to be supplied with copies of the records by mail, the requester must include with his or her request sufficient data for the agency to verify the requester's identity.

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

Any individual may contest information contained within a record in the system that pertains to him/her by submitting a written request to the system manager at the email address listed at the beginning of this document. The request must include the reason for contesting the record and the



proposed amendment to the information with supporting documentation to show how the record is inaccurate.

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

This PIA and the publication of the USDA APHIS-9 Wildlife Services Management Information System SORN notify individuals of the procedures for correcting information managed in MIS 2000. The agency also provides the public with information via publicly accessible websites.²

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

N/A, there is a formal process.

7.5. PRIVACY IMPACT ANALYSIS: Related to Redress.

<u>**Privacy Risk</u>**: There is a risk that individuals will not be aware of the options or processes to access or update their information.</u>

<u>Mitigation</u>: APHIS provides individuals with access and or the ability to correct to his or her records when requested through a Privacy Act request. APHIS includes instructions on how to submit these requests via the System of Records Notice, and within this PIA.

Section 8 Auditing and Accountability

The following questions are intended to describe technical safeguards and security measures.

8.1. How is the information in the system/project/program secured?

Procedures in place to determine which users may access the system include unique user identification, two-factor authentication (eAuth), agency implemented cybersecurity measures, and firewalls installed at each access point. When employees leave or are removed from WS they are locked out of the MIS system.

The information collected about WS employees and cooperators is protected through several mitigation efforts that include information access control and system procedures. Individuals

² <u>https://www.aphis.usda.gov/aphis/resources/foia/ct_how_to_submit_a_foia_request</u>



involved in all processes are restricted to data that they are authorized to handle, and the data is not exposed to any unauthorized users during this process.

All transfer of data occurs through the Agency's standard virtual private network (VPN) in encrypted formats. Hard copy components of the system are segregated and protected in secured and locked storage cabinets accessible only to authorized users. Other internal safeguards include monitoring of data management and development processes by the Information Systems Security Officer (ISSO), and supervisory controls for field level data entry and handling.

8.2. What procedures are in place to determine which users may access the program or system/project, and are they documented?

Only users who are authenticated and designated as active are permitted access to MIS2000. Access privileges are determined by role-based or feature-based access control, which specifies what actions users can perform within the system. These access rights are assigned based on the specific responsibilities of each individual.

To obtain an MIS2000 account, users must utilize their e-Authentication credentials. Initially, users complete the User Management System access request form, specifying their Agency, Role, System, and Reporting requirements communicated to the user from their supervisor. This form is then reviewed and approved by the user's supervisor and the MIS2000 business owner's representative. User access is requested and documented through the APHIS Standard Form 513.

8.3. How does the program review and approve information sharing requirements?

All information sharing requirements are reviewed with the Information System Security Officer, MRP Chief Privacy Officer, and APHIS Privacy Act Office.

8.4. Describe what privacy training is provided to users either generally or specifically relevant to the program or system/project?

Users are required to take the annual Information Security Awareness training. All new users are also given orientation on protecting privacy in the Wildlife Services system of records.



Approval Signatures:

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