

Attachment 8. PIAs Warehouse, Platforms - Privacy Impact Assessments (PIAs) for the Data Warehouse, Public Health Surveillance Platform and Consolidated Statistical Platform

06.1 HHS Privacy Impact Assessment (Form) / Data Warehouse
CDC PIA (April 2011)

Primavera ProSight

PIA SUMMARY

The following required questions with an asterisk (*) represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget (OMB) and public posting in accordance with OMB Memorandum (M) 03-22.

Note: If a question or its response is not applicable, please answer "N/A" to that question where possible. If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of personally identifiable information (PII). If no PII is contained in the system, please answer questions in the PIA Summary Tab and then promote the PIA to the Senior Official for Privacy who will authorize the PIA. If this system contains PII, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

Summary of PIA Required Questions

*Is this a new PIA?

No

If this is an existing PIA, please provide a reason for revision:

C&A Annual Requirements

*1. Date of this Submission:

10/24/2011

*2. OPDIV Name:

CDC

*3. Unique Project Identifier (UPI) Number for current fiscal year:

009-20-01-02-01-0908-00

*4. Privacy Act System of Records Notice (SORN) Number (If response to Q.21 is Yes, a SORN number is required for Q.4):

09-20-0136

*5. OMB Information Collection Approval Number:

*6. Other Identifying Number(s):

*7. System Name (Align with system item name):

Data Warehouse (DW)

*9. System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:

Point of Contact Information

POC Name

Robb Chapman

*10. Provide an overview of the system:

Note: If SSN's (Social Security Numbers) will be collected, maintained (stored), disseminated and/or pass through within any database(s), record(s), file(s) or website(s) hosted by this system you must complete and submit Attachment A - SSN Elimination or Usage Approval Request located at <http://intranet.cdc.gov/ociso/pandp/policy.html>

Note: According to OMB 07-18M, All agencies MUST participate in government-wide effort to eliminate unnecessary use of and explore alternatives to agency use of Social Security Numbers as a personal identifier for both Federal employees and in Federal programs.

*13. Indicate if the system is new or an existing one being modified:

DW collects data pertaining to diseases across states with disparate systems into a repository used for surveillance and analysis.

*17 Does/Will the system collect, maintain (store), disseminate and/or pass through PII within any database(s), record(s), file(s) or website(s) hosted by this system?

TIP: If the answer to Question 17 is "No" (indicating the system does not contain PII), only the remaining PIA Summary tab questions need to be completed and submitted. If the system does contain PII, the full PIA must be completed and submitted. (Although note that "Employee systems," i.e., systems that collect PII "permitting the physical or online contacting of a specific individual employed [by] the Federal Government - only need to complete the PIA Summary tab.)

Yes

17a. Is this a GSS PIA included for C&A purposes only, with no ownership of underlying application data? If the response to Q. 17a is Yes, the response to Q. 17 should be No and only the PIA Summary must be completed. **NOTE: TO BE DETERMINED AND COMPLETED BY OCISO ONLY!!!**

*19 Are records on the system retrieved by 1 or more PII data elements?

Yes

*21. Is the system subject to the Privacy Act? (If the response to Q. 19 is Yes, the response to Q. 21 must be Yes and a SORN number is required for Q. 4.)

Yes

*23. If the system shares or discloses PII, please specify with whom and for what purpose(s):

*30. Please describe in detail: (1) The information the agency will collect, maintain, or disseminate (clearly state if the information contained in the system ONLY represents federal contact data); (2) Why and for what purpose the agency will use the information; (3) Explicitly indicate whether the information contains PII; and (4) Whether submission of personal information is voluntary or mandatory.

DW is a non-major application that receives data, including IIF for its clients systems within CDC, CCID and DISSS.

*31. Please describe in detail any processes in place to: (1) Notify and obtain consent from the individual's whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection); (2) Notify and obtain consent from individuals regarding what PII is being collected from them; and (3) How the information will be used or shared. (Note: Please describe in what format individuals will be given notice of consent [e.g., written notice, electronic notice, etc.].)

None

*32. Does the system host a website? (Note: If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of PII)

No

*37. Does the website have any information or pages directed at children under the age of thirteen?

N/A

*50. Are there policies or guidelines in place with regard to the retention and destruction of PII? (Refer to the C&A package and/or the Records Retention and Destruction section in SORN)

Yes

*54. Briefly describe in detail how the PII will be secured on the system using administrative, technical, and physical controls:

DW is subject to certification and accreditation requirements of CDC "Moderate" security systems. It is subject to oversight from an assigned security professional, as well as OIG audit and OCISO requirements.

40. Does the website contain links to sites external to HHS that owns and/or operates the system?

40a. If yes, note whether the system provides a disclaimer notice for users that follow external links to websites not owned or operated by HHS.

ADMINISTRATIVE CONTROLS

Administrative Controls

Note: This PIA uses the terms "Administrative," "Technical" and "Physical" to refer to security control questions. Terms that are used in several Federal laws when referencing security requirements.

41. Has the system been certified and accredited (C&A)?

Yes

41a. If yes, please indicate when the C&A was completed (Note: The C&A date is populated in the System Inventory form via the responsible Security personnel).

11/14/2008

41b. If a system requires a C&A and no C&A was completed, is a C&A in progress?

42. Is there a system security plan for this system?

Yes

43. Is there a contingency (or backup) plan for the system?

Yes

44. Are files backed up regularly?

Yes

45. Are backup files stored offsite?

Yes

46. Are there user manuals for the system?

Yes

47. Have personnel (system owners, managers, operators, contractors and/or program managers) using the system been trained and made aware of their responsibilities for protecting the information being collected and maintained?

Yes

48. If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?

Yes

49. Are methods in place to ensure least privilege (i.e., "need to know" and accountability)?

Yes

49a. If yes, please specify method(s):

Access is role based and limited to technical staff. No IIF is available to the general contractor population.

*50. Are there policies or guidelines in place with regard to the retention and destruction of PII? (Refer to the C&A package and/or the Records Retention and Destruction section in SORN):

Yes

50a. If yes, please provide some detail about these policies/practices.

APPROVAL/DEMOTION

System Information

System Name: Data Warehouse (DW)

Senior Official for Privacy Approval/Promotion or Demotion

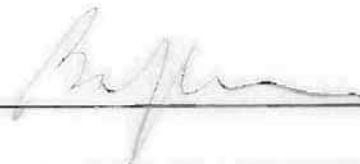
Promotion/Demotion: PROMOTE

Comments:

OPDIV Senior Official for Privacy or Designee Approval

Please print the PIA and obtain the endorsement of the reviewing official below. Once the signature has been collected, retain a hard copy for the OPDIV's records. Submitting the PIA will indicate the reviewing official has endorsed it

This PIA has been reviewed and endorsed by the OPDIV Senior Official for Privacy or Designee (Name and Date):

Name:  Date: 09/20/2011

Name:	Beverly E. Walker	
Date:		

Department Approval to Publish to the Web

Approved for web publishing	
Date Published:	
Publicly posted PIA URL or no PIA URL explanation:	

CDC PIA (April 2011)

PIA SUMMARY

The following required questions with an asterisk (*) represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget (OMB) and public posting in accordance with OMB Memorandum (M) 03-22.

Note: If a question or its response is not applicable, please answer "N/A" to that question where possible. If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of personally identifiable information (PII). If no PII is contained in the system, please answer questions in the PIA Summary Tab and then promote the PIA to the Senior Official for Privacy who will authorize the PIA. If this system contains PII, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

Summary of PIA Required Questions

*Is this a new PIA?

Yes

If this is an existing PIA, please provide a reason for revision:

*1. Date of this Submission:

October 11, 2012

*2. OPDIV Name:

OSELS/PHISIPO/DISO

*3. Unique Project Identifier (UPI) Number for current fiscal year:

None

*4. Privacy Act System of Records Notice (SORN) Number (If response to Q.21 is Yes, a SORN number is required for Q.4):

Not Applicable

*5. OMB Information Collection Approval Number:

Not Applicable

*6. Other Identifying Number(s):

ESC ID 2184

*7. System Name (Align with system item name):

Public Health Surveillance Platform – Case Notification (PHSP-CN)

*9. System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:

Point of Contact Information

POC Name

Laura Conn (Business Steward)

*10. Provide an overview of the system:

Note: If SSN's (Social Security Numbers) will be collected, maintained (stored), disseminated and/or pass through within any database(s), record(s), file(s) or website(s) hosted by this system you must complete and submit **Attachment A – SSN Elimination or Usage Approval Request** located at <http://intranet.cdc.gov/ociso/pandp/policy.html>

Note: According to OMB 07-16M, All agencies MUST participate in government-wide effort to eliminate unnecessary use of and explore alternatives to agency use of Social Security Numbers as a personal identifier for both Federal employees and in Federal programs.

CDC's PHSP-CN system is a multifaceted public health disease surveillance system that gives public health officials powerful capabilities to monitor the occurrence and spread of diseases. Facets of PHSP-CN will be used by numerous state, territorial, tribal, and local health departments; and by partner organizations, such as the Council of State and Territorial Epidemiologists (CSTE), to

- facilitate collecting, managing, analyzing, interpreting, and disseminating health related data for diseases designated as nationally notifiable,
- develop and maintain national standards (for example, consistent case definitions for nationally notifiable diseases) applicable across states,
- maintain the official national notifiable diseases statistics,
- provide detailed data to public health partners to aid in identifying specific disease trends,
- work with states and partners to implement and assess prevention and control programs, and
- publish summarized data findings from 57 state, territorial, and local reporting jurisdictions in the Morbidity and Mortality Weekly Report (MMWR).

<http://wwwn.cdc.gov/nndss/> (reference source)

Note: SSN is not being collected or analyzed in this project.

*13. Indicate if the system is new or an existing one being modified:

New

*17. Does/Will the system collect, maintain (store), disseminate and/or pass through PII within any database(s), record(s), file(s) or website(s) hosted by this system?

TIP: If the answer to Question 17 is "No" (indicating the system does not contain PII), only the remaining PIA Summary tab questions need to be completed and submitted. If the system does contain PII, the full PIA must be completed and submitted. (Although note that "Employee systems," - i.e., systems that collect PII "permitting the physical or online contacting of a specific individual ... employed [by] the Federal Government - only need to complete the PIA Summary tab.)

Yes

17a. Is this a GSS PIA included for C&A purposes only, with no ownership of underlying application data? If the response to Q.17a is Yes, the response to Q.17 should be No and only the PIA Summary must be completed. NOTE: TO BE DETERMINED AND COMPLETED BY OCISO ONLY!!!

*19. Are records on the system retrieved by 1 or more PII data elements?

No

*21. Is the system subject to the Privacy Act? (If the response to Q.19 is Yes, the response to Q.21 must be Yes and a SORN number is required for Q.4)

No

*23. If the system shares or discloses PII, please specify with whom and for what purpose(s):

PHSP-CN shares PII data with CDC personnel working in OID.

*30. Please describe in detail: (1) The information the agency will collect, maintain, or disseminate (clearly state if the information contained in the system ONLY represents federal contact data); (2) Why and for what purpose the agency will use the information; (3) Explicitly indicate whether the information contains PII; and (4) Whether submission of personal information is voluntary or mandatory:

- (1) Contains generic patient (case) contact data
- (2) Case notification (i.e. state public health departments sends data to CDC regarding notifiable conditions)
- (3) Case notification data contains the PII (birth date, zip code, county)
- (4) Case notification data submission to CDC by state public health departments is voluntary. But the state public health departments collect the PII as mandatory data elements. CDC does not receive all the PII collected by state public health departments. Case notification data received by CDC has a local case ID created by state public health case notification surveillance system. For more information, please see the NNDSS website - <http://wwwn.cdc.gov/nndss/script/DataCollection.aspx>

**31. Please describe in detail any processes in place to: (1) Notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection); (2) Notify and obtain consent from individuals regarding what PII is being collected from them; and (3) How the information will be used or shared. (Note: Please describe in what format individuals will be given notice of consent [e.g., written notice, electronic notice, etc.]):*

- (1) CDC Case notification data does not contain direct personal identifiers (e.g. Name, Contact information for patients / subjects). CDC cannot notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system. All the communication to the patient or subject has to go through the reporting jurisdiction because the reporting jurisdiction retains all the contact information for the patients / subjects in their local jurisdictional case notification surveillance system.
- (2) CDC cannot notify and obtain consent from individuals regarding what PII is being collected from them because CDC case notification data does not contain direct personal identifiers. All the communication to the patient or subject has to go through the reporting jurisdiction.
- (3) Written notice or electronic notice cannot be given directly to patient or subject as the CDC case notification data does not contain direct personal identifiers (Name, Contact information). All the communication to the patient or subject has to go through the reporting jurisdiction.

**32. Does the system host a website? (Note: If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of PII)*

Yes

**37. Does the website have any information or pages directed at children under the age of thirteen?*

No

**50. Are there policies or guidelines in place with regard to the retention and destruction of PII? (Refer to the C&A package and/or the Records Retention and Destruction section in SORN)*

Yes

**54. Briefly describe in detail how the PII will be secured on the system using administrative, technical, and physical controls:*

PII will be secured using a layered approach. Physical controls are in-place by virtue of the hosting environment. Administrative controls are in-place by virtue of a limited user base (i.e., access is not open). Technical controls are in-place at the application level to grant access to data based on authentication and authorization (e.g., role-based access to jurisdictionally-based data only).

WEBSITE HOSTING PRACTICES

1 Website Hosting Practices

*32. Does the system host a website? (Note: If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of PII)

Yes

Please indicate "Yes" or "No" for each type of site below. If the system hosts both Internet and Intranet sites, indicate "Yes" for "Both" only.	Yes/ No	If the system hosts an Internet site, please enter the site URL. Do not enter any URL(s) for Intranet sites.
Internet	No	
Intranet	Yes	
Both	No	

33. Does the system host a website that is accessible by the public and does not meet the exceptions listed in OMB M-03-22?

Note: OMB M-03-22 Attachment A, Section III, Subsection C requires agencies to post a privacy policy for websites that are accessible to the public, but provides three exceptions: (1) Websites containing information other than "government information" as defined in OMB Circular A-130; (2) Agency intranet websites that are accessible only by authorized government users (employees, contractors, consultants, fellows, grantees); and (3) National security systems defined at 40 U.S.C. 11103 as exempt from the definition of information technology (see section 202(i) of the E-Government Act).

No.

34. If the website does not meet one or more of the exceptions described in Q. 33 (i.e., response to Q. 33 is "Yes"), a website privacy policy statement (consistent with OMB M-03-22 and Title II and III of the E-Government Act) is required. Has a website privacy policy been posted? (Note: A website privacy policy is required for Internet sites only.)

Not Applicable

35. If a website privacy policy is required (i.e., response to Q. 34 is "Yes"), is the privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)? (Note: Privacy policy in machine-readable format is required for Internet sites only.)

Not Applicable

35a. If no, please indicate when the website will be P3P compliant:

N/A

36. Does the website employ tracking technologies?

No

Please indicate "Yes", "No", or "N/A" for each type of cookie below:	Yes/No/N/A
Web Bugs	No
Web Beacons	No
Session Cookies	No
Persistent Cookies	No
Other	No

*37. Does the website have any information or pages directed at children under the age of thirteen?

No

APPROVAL/DEMOTION

1 System Information

System Name: Public Health Surveillance Platform – Case Notification (PHSP-CN)

2 Senior Official for Privacy Approval/Promotion or Demotion

Promotion/Demotion: PROMOTE

Comments:

3 OPDIV Senior Official for Privacy or Designee Approval

Please print the PIA and obtain the endorsement of the reviewing official below. Once the signature has been collected, retain a hard copy for the OPDIV's records. Submitting the PIA will indicate the reviewing official has endorsed it

This PIA has been reviewed and endorsed by the OPDIV Senior Official for Privacy or Designee (Name and Date):

Name: *Beverly E. Walker* **Date:** 16 October 2012

Name: Beverly E. Walker

Date:

4 Department Approval to Publish to the Web

Approved for web publishing

Date Published:

Publicly posted PIA URL or no PIA URL explanation:

PIA SUMMARY

1

The following required questions with an asterisk (*) represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget (OMB) and public posting in accordance with OMB Memorandum (M) 03-22.

Note: If a question or its response is not applicable, please answer "N/A" to that question where possible. If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of personally identifiable information (PII). If no PII is contained in the system, please answer questions in the PIA Summary Tab and then promote the PIA to the Senior Official for Privacy who will authorize the PIA. If this system contains PII, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

2 Summary of PIA Required Questions

*Is this a new PIA?

No

If this is an existing PIA, please provide a reason for revision:

Annual Self-Assessment

*1. Date of this Submission:

April 11, 2012

*2. OPDIV Name:

ITSO

*3. Unique Project Identifier (UPI) Number for current fiscal year:

009-20-02-00-01-1152-00

*4. Privacy Act System of Records Notice (SORN) Number (If response to Q.21 is Yes, a SORN number is required for Q.4):

No

*5. OMB Information Collection Approval Number:

No

*6. Other Identifying Number(s):

No

*7. System Name (Align with system item name):

Consolidated Statistical Platform (CSP)

*9. System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:

Point of Contact Information	
POC Name	Jim Landers

*10. Provide an overview of the system:

Note: If SSN's(Social Security Numbers) will be collected, maintained (stored), disseminated and/or pass through within any database(s), record(s), file(s) or website(s) hosted by this system you must complete and submit **Attachment A – SSN Elimination or Usage Approval Request** located at <http://intranet.cdc.gov/ociso/pandp/policy.html>
 According to OMB 07-16M, All agencies MUST participate in government-wide effort to eliminate unnecessary use of and explore alternatives to agency use of Social Security Numbers as a personal identifier for both Federal employees and in Federal programs.

The CSP provides a centralized locus for the storage and processing of statistical data for

internal CDC customers. The statistical tools are SAS and SAS-callable SUDAAN, but it is possible that other applications may be added in future revisions of the platform. The CSP system resides on a logically-isolated and firewalled network segment (VLAN). SAS Data Sets and the supporting documents and scripts reside in SAN storage connected to CSP Servers and in SQL databases located on the ITSO Consolidated SQL Platform.

*13. Indicate if the system is new or an existing one being modified:

Existing

*17. Does/Will the system collect, maintain (store), disseminate and/or pass through PII within any database(s), record(s), file(s) or website(s) hosted by this system?

Note: This question seeks to identify any, and all, personal information associated with the system. This includes any PII, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation. If the information contained in the system ONLY represents federal contact data (i.e., federal contact name, federal address, federal phone number, and federal email address), it does not qualify as PII, according to the E-Government Act of 2002, and the response to Q.17 should be No (only the PIA Summary is required). If the system contains a mixture of federal contact information and other types of PII, the response to Q.17 should be Yes (full PIA is required).

No

17a. Is this a GSS PIA included for C&A purposes only, with no ownership of underlying application data? If the response to Q.17a is Yes, the response to Q.17 should be No and only the PIA Summary must be completed. TO BE DETERMINED AND COMPLETED BY OCISO ONLY!!!

*19. Are records on the system retrieved by 1 or more PII data elements?

No

*21. Is the system subject to the Privacy Act? (If the response to Q.19 is Yes, the response to Q.21 must be Yes and a SORN number is required for Q.4)

No

*23. If the system shares or discloses PII, please specify with whom and for what purpose(s):

No

*30. Please describe in detail: (1) The information the agency will collect, maintain, or disseminate (clearly state if the information contained in the system ONLY represents federal contact data); (2) Why and for what purpose the agency will use the information; (3) Explicitly indicate whether the information contains PII; and (4) Whether submission of personal information is voluntary or mandatory:

N/A

*31. Please describe in detail any processes in place to: (1) Notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection); (2) Notify and obtain consent from individuals regarding what PII is being collected from them; and (3) How the information will be used or shared. (Note: Please describe in what format individuals will be given notice of consent [e.g., written notice, electronic notice, etc.]):

N/A

*32. Does the system host a website? (Note: If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of PII)

No

*37. Does the website have any information or pages directed at children under the age of thirteen?

No

*50. Are there policies or guidelines in place with regard to the retention and destruction of PII? (Refer to the C&A package and/or the Records Retention and Destruction section in SORN)

No

*54. Briefly describe in detail how the PII will be secured on the system using administrative, technical, and physical controls:

No

APPROVAL/DEMOTION

1	System Information
System Name:	Consolidated Statistical Platform (CSP)

2	Senior Official for Privacy Approval/Promotion or Demotion
Promotion/Demotion:	PROMOTE
Comments:	

3	OPDIV Senior Official for Privacy or Designee Approval
Please print the PIA and obtain the endorsement of the reviewing official below. Once the signature has been collected, retain a hard copy for the OPDIV's records. Submitting the PIA will indicate the reviewing official has endorsed it	
This PIA has been reviewed and endorsed by the OPDIV Senior Official for Privacy or Designee (Name and Date):	
Name: <u><i>Beverly E. Walker</i></u>	Date: <u>30 August 2012</u>
Name: <u>Beverly E. Walker</u>	
Date: _____	

4	Department Approval to Publish to the Web
Approved for web publishing	
Date Published:	
Publicly posted PIA URL or no PIA URL explanation:	