

Privacy Impact Assessment Form

v 1.43

Status Form Number Form Date

Question

Answer

1 OPDIV:

Read Only - OPDIV

NIH

2 PIA Unique Identifier:

Read Only- PIA Unique ID

2a Name:

Read Only-Name

Genomic Data Commons

3 The subject of this PIA is which of the following?

- General Support System (GSS)
- Major Application
- Minor Application (stand-alone)
- Minor Application (child)
- Electronic Information Collection
- Unknown

**(G-DC)
Help
Desk**

3a Identify the Enterprise Performance Lifecycle Phase of the system.

Implementation

3b Is this a FISMA-Reportable system?

- Yes
- No

4 Does the system include a Website or online application available to and for the use of the general public?

- Yes
- No

5 Identify the operator.

- Agency
- Contractor

6 Point of Contact (POC):

POC Title

POC Name

POC Organization

POC Email

POC Phone

7 Is this a new or existing system?

- New
- Existing

8 Does the system have Security Authorization (SA)?

- Yes
- No

8a Date of Security Authorization

May 2, 2016

<p>11 Describe the purpose of the system.</p>	<p>The purpose of the GDC Help Desk is to provide assistance to users that have inquiries, data submission requests, or issues in using the NCI Genomic Data Commons (GDC).</p>																												
<p>12 Describe the type of information the system will collect, maintain (store), or share. (Subsequent questions will identify if this information is PII and ask about the specific data elements.)</p>	<p>The system will collect the user name, e-mail, phone number (if provided) and inquiry or reported problem. The information will be shared with the GDC Support Team to allow them to communicate with the user to respond to user inquiries.</p>																												
<p>13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.</p>	<p>The GDC Help Desk uses the Kayako ticketing software. A user can choose to submit a GDC Help Desk Request by sending an e-mail to GDC Support (support@nci-gdc.datacommons.io). A user requesting data submission into the GDC, can complete a web-based GDC Data Submission Request Form. The user's request is routed to the Kayako ticketing system where a GDC Support Team member reviews the request and responds to the user in the user preferred response mechanism (e-mail or phone - if provided). The Kayako Help Desk System will collect the user's name, e-mail, phone number (if provided) and inquiry or reported problem. The information will be shared with the GDC Support Team to allow them to communicate with the user to respond to user inquiries.</p>																												
<p>14 Does the system collect, maintain, use or share PII?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>																												
<p>15 Indicate the type of PII that the system will collect or maintain.</p>	<table border="0"> <tr> <td><input type="checkbox"/> Social Security Number</td> <td><input type="checkbox"/> Date of Birth</td> </tr> <tr> <td><input checked="" type="checkbox"/> Name</td> <td><input type="checkbox"/> Photographic Identifiers</td> </tr> <tr> <td><input type="checkbox"/> Driver's License Number</td> <td><input type="checkbox"/> Biometric Identifiers</td> </tr> <tr> <td><input type="checkbox"/> Mother's Maiden Name</td> <td><input type="checkbox"/> Vehicle Identifiers</td> </tr> <tr> <td><input checked="" type="checkbox"/> E-Mail Address</td> <td><input type="checkbox"/> Mailing Address</td> </tr> <tr> <td><input checked="" type="checkbox"/> Phone Numbers</td> <td><input type="checkbox"/> Medical Records Number</td> </tr> <tr> <td><input type="checkbox"/> Medical Notes</td> <td><input type="checkbox"/> Financial Account Info</td> </tr> <tr> <td><input type="checkbox"/> Certificates</td> <td><input type="checkbox"/> Legal Documents</td> </tr> <tr> <td><input type="checkbox"/> Education Records</td> <td><input type="checkbox"/> Device Identifiers</td> </tr> <tr> <td><input type="checkbox"/> Military Status</td> <td><input type="checkbox"/> Employment Status</td> </tr> <tr> <td><input type="checkbox"/> Foreign Activities</td> <td><input type="checkbox"/> Passport Number</td> </tr> <tr> <td><input type="checkbox"/> Taxpayer ID</td> <td><input type="text" value="Other..."/></td> </tr> <tr> <td><input type="text" value="Other..."/></td> <td><input type="text" value="Other..."/></td> </tr> <tr> <td><input type="text" value="Other..."/></td> <td><input type="text" value="Other..."/></td> </tr> </table>	<input type="checkbox"/> Social Security Number	<input type="checkbox"/> Date of Birth	<input checked="" type="checkbox"/> Name	<input type="checkbox"/> Photographic Identifiers	<input type="checkbox"/> Driver's License Number	<input type="checkbox"/> Biometric Identifiers	<input type="checkbox"/> Mother's Maiden Name	<input type="checkbox"/> Vehicle Identifiers	<input checked="" type="checkbox"/> E-Mail Address	<input type="checkbox"/> Mailing Address	<input checked="" type="checkbox"/> Phone Numbers	<input type="checkbox"/> Medical Records Number	<input type="checkbox"/> Medical Notes	<input type="checkbox"/> Financial Account Info	<input type="checkbox"/> Certificates	<input type="checkbox"/> Legal Documents	<input type="checkbox"/> Education Records	<input type="checkbox"/> Device Identifiers	<input type="checkbox"/> Military Status	<input type="checkbox"/> Employment Status	<input type="checkbox"/> Foreign Activities	<input type="checkbox"/> Passport Number	<input type="checkbox"/> Taxpayer ID	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>
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<p>16 Indicate the categories of individuals about whom PII is collected, maintained or shared.</p>	<p><input type="checkbox"/> Employees <input type="checkbox"/> Public Citizens <input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies) <input checked="" type="checkbox"/> Vendors/Suppliers/Contractors <input type="checkbox"/> Patients Other <input type="text"/></p>																												
<p>17 How many individuals' PII is in the system?</p>	<p><input type="text" value="500-4,999"/></p>																												

18	For what primary purpose is the PII used? To allow the GDC Support Team to respond to user support requests, data submission requests, or inquiries.	
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research) To improve GDC Documentation and Training	
20	Describe the function of the SSN. N/A	
20a	Cite the legal authority to use the SSN. N/A	
21	Identify legal authorities governing information use and disclosure specific to the system and program. The System of Records Notice (09-25-0156 SYSTEMS LISTING) provides the legal authority governing information use	
22	Are records on the system retrieved by one or more PII data elements? <input checked="" type="radio"/> Yes <input type="radio"/> No	
22a	Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or identify if a SORN is being developed. Published: 09-25-0156 SYSTEMS LISTING Published: Published: <input type="checkbox"/> In Progress	
23	Identify the sources of PII in the system. Directly from an individual about whom the information pertains <input type="checkbox"/> In-Person <input type="checkbox"/> Hard Copy: Mail/Fax <input checked="" type="checkbox"/> Email <input type="checkbox"/> Online <input type="checkbox"/> Other Government Sources <input checked="" type="checkbox"/> Within the OPDIV <input checked="" type="checkbox"/> Other HHS OPDIV <input type="checkbox"/> State/Local/Tribal <input type="checkbox"/> Foreign <input checked="" type="checkbox"/> Other Federal Entities <input type="checkbox"/> Other Non-Government Sources <input checked="" type="checkbox"/> Members of the Public <input type="checkbox"/> Commercial Data Broker <input checked="" type="checkbox"/> Public Media/Internet <input checked="" type="checkbox"/> Private Sector <input type="checkbox"/> Other	
23a	Identify the OMB information collection approval number and expiration date. The GDC Data Submission Request Form is currently undergoing OMB Clearance	
24	Is the PII shared with other organizations? <input type="radio"/> Yes <input checked="" type="radio"/> No	

<p>24a Identify with whom the PII is shared or disclosed and for what purpose.</p>	<p><input checked="" type="checkbox"/> Within HHS</p> <p><input type="checkbox"/> Other Federal Agency/Agencies</p> <p><input type="checkbox"/> State or Local Agency/Agencies</p> <p><input type="checkbox"/> Private Sector</p> <p>To respond to user inquiries and provide user support</p>
<p>24b Describe any agreements in place that authorizes the information sharing or disclosure (e.g. Computer Matching Agreement, Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).</p>	<p>The GDC System in its entirety has an Authority to Operate (ATO) and contract between the NCI, Leidos Biomedical Research and The University of Chicago Center for Data Intensive Science (CDIS).</p>
<p>24c Describe the procedures for accounting for disclosures</p>	<p>The GDC Help Desk allows GDC Support Team members to access user inquiries and respond to users to provide assistance.</p>
<p>25 Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.</p>	<p>The GDC Web Site provides links to the GDC Privacy Policy and Privacy Act Notification Statement on the GDC Support Page:</p> <ul style="list-style-type: none"> • GDC Support Page: https://gdc.nci.nih.gov/support (See the Help Desk block in lower right of the page. It contains links to the policy and notification.) • GDC Privacy Policy: https://gdc.nci.nih.gov/node/658/ • GDC Privacy Act Notification Statement: https://gdc.nci.nih.gov/node/661/ <p>The GDC Data Submission Request Form is located on the GDC Web Site and provides a Privacy Act Notification as well as a Burden Statement, per OMB requirement.</p>
<p>26 Is the submission of PII by individuals voluntary or mandatory?</p>	<p><input checked="" type="radio"/> Voluntary</p> <p><input type="radio"/> Mandatory</p>
<p>27 Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.</p>	<p>PII needs to be collected for any user that contacts the GDC Help Desk for assistance or requesting data submission into the GDC so that the GDC can respond to the user. Users can participate in 3rd party online Discussion Forums as a self-help measure and review online GDC documentation on the GDC Web Site.</p>
<p>28 Describe the process to 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 original collection). Alternatively, describe why they cannot be notified or have their consent obtained.</p>	<p>The process for notifying existing users involves contacting the users who have submitted requests for assistance through the GDC Help Desk. The process for notifying users of new requests will involve identifying the consent policies and any changes in the automated e-mail response that gets sent to users who contact the GDC Help Desk.</p>
<p>29 Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate. If no process exists, explain why not.</p>	<p>The process involves removing the user and any associated ticket from the GDC Kayako Help Desk system.</p>

<p>30 Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy. If no processes are in place, explain why not.</p>	<p>The Kayako Help Desk tickets are currently reviewed on a weekly basis during the GDC User Support Working Group Meeting. Additionally, monthly reports on the status of help desk tickets are provided and can include a monthly review of the PII in the system.</p>											
<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<table border="1"> <tr> <td data-bbox="730 283 950 346"><input type="checkbox"/> Users</td> <td data-bbox="950 283 1412 346"></td> </tr> <tr> <td data-bbox="730 346 950 472"><input checked="" type="checkbox"/> Administrators</td> <td data-bbox="950 346 1412 472">Administrators responsible for upgrading Kayako may have access to the PII</td> </tr> <tr> <td data-bbox="730 472 950 661"><input checked="" type="checkbox"/> Developers</td> <td data-bbox="950 472 1412 661">Developers from UChicago and the Ontario Institute for Cancer Research (OICR) will have access to the PII to review any development related inquiries</td> </tr> <tr> <td data-bbox="730 661 950 777"><input checked="" type="checkbox"/> Contractors</td> <td data-bbox="950 661 1412 777">Leidos, UChicago, OICR, and ESI will access the PII to review and respond to user inquiries</td> </tr> <tr> <td data-bbox="730 777 950 924"><input checked="" type="checkbox"/> Others</td> <td data-bbox="950 777 1412 924">The GDC Data Submission Review Committee will have access to the PII associated with GDC Data Submission Requests</td> </tr> </table>	<input type="checkbox"/> Users		<input checked="" type="checkbox"/> Administrators	Administrators responsible for upgrading Kayako may have access to the PII	<input checked="" type="checkbox"/> Developers	Developers from UChicago and the Ontario Institute for Cancer Research (OICR) will have access to the PII to review any development related inquiries	<input checked="" type="checkbox"/> Contractors	Leidos, UChicago, OICR, and ESI will access the PII to review and respond to user inquiries	<input checked="" type="checkbox"/> Others	The GDC Data Submission Review Committee will have access to the PII associated with GDC Data Submission Requests	
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<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>The GDC User Services Manager is responsible for assigning all access to the GDC Kayako Help Desk System. Only users that have the required security and privacy training are allowed to obtain access.</p>											
<p>33 Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.</p>	<p>All Tier 1 and Tier 2 GDC Support Team members and GDC management support have access to the GDC Kayako Help Desk System for reviewing and responding to user inquiries. The GDC Data Submission Review Committee composed of NCI and subcontractor leadership have access to GDC Data Submission Requests that are routed through the Kayako Help Desk System. Only the designated GDC User Services Manager and GDC administrators can create user accounts. Only GDC administrators can perform upgrades.</p>											
<p>34 Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.</p>	<p>Training for GDC Kayako Help Desk users includes the required HHS Security and Privacy training. The GDC User Services Manager provides personnel with hands-on training and can make all users aware of responsibilities with protecting information once a user account is created.</p>											
<p>35 Describe training system users receive (above and beyond general security and privacy awareness training).</p>	<p>The GDC User Services Manager provides personnel with hands-on training and can make all users aware of responsibilities with protecting information once a user account is created.</p>											
<p>36 Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>											

37 Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.	The GDC Kayako Help Desk System will be retained until the end of the GDC contract. The current GDC contract ends 5/19/2018. If there are no additional extensions, the Kayako Help Desk System will be taken offline and all information sanitized.												
38 Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	Only users with access to the GDC Kayako Help Desk System will be able to access the PII.												
39 Identify the publicly-available URL:	Staff Access: https://support.datacommons.io/staff/												
40 Does the website have a posted privacy notice?	<input checked="" type="radio"/> Yes <input type="radio"/> No												
40a Is the privacy policy available in a machine-readable format?	<input checked="" type="radio"/> Yes <input type="radio"/> No												
41 Does the website use web measurement and customization technology?	<input checked="" type="radio"/> Yes <input type="radio"/> No												
41a Select the type of website measurement and customization technologies is in use and if it is used to collect PII. (Select all that apply)	<table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:50%; text-align: left;">Technologies</th> <th style="width:50%; text-align: left;">Collects PII?</th> </tr> </thead> <tbody> <tr> <td><input type="checkbox"/> Web beacons</td> <td><input type="radio"/> Yes <input type="radio"/> No</td> </tr> <tr> <td><input type="checkbox"/> Web bugs</td> <td><input type="radio"/> Yes <input type="radio"/> No</td> </tr> <tr> <td><input checked="" type="checkbox"/> Session Cookies</td> <td><input type="radio"/> Yes <input type="radio"/> No</td> </tr> <tr> <td><input checked="" type="checkbox"/> Persistent Cookies</td> <td><input type="radio"/> Yes <input type="radio"/> No</td> </tr> <tr> <td>Other... <input style="width: 50px;" type="text"/></td> <td><input type="radio"/> Yes <input type="radio"/> No</td> </tr> </tbody> </table>	Technologies	Collects PII?	<input type="checkbox"/> Web beacons	<input type="radio"/> Yes <input type="radio"/> No	<input type="checkbox"/> Web bugs	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="checkbox"/> Session Cookies	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="checkbox"/> Persistent Cookies	<input type="radio"/> Yes <input type="radio"/> No	Other... <input style="width: 50px;" type="text"/>	<input type="radio"/> Yes <input type="radio"/> No
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42 Does the website have any information or pages directed at children under the age of thirteen?	<input type="radio"/> Yes <input checked="" type="radio"/> No												
43 Does the website contain links to non- federal government websites external to HHS?	<input checked="" type="radio"/> Yes <input type="radio"/> No												
43a Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	<input checked="" type="radio"/> Yes <input type="radio"/> No												
REVIEWER QUESTIONS: The following section contains Reviewer Questions which are not to be filled out unless the user is an OPDIV Senior Officer for Privacy.													
Reviewer Questions	Answer												
1 Are the questions on the PIA answered correctly, accurately, and completely?	<input type="radio"/> Yes <input type="radio"/> No												
Reviewer Notes	<input style="width: 600px; height: 20px;" type="text"/>												

Reviewer Questions		Answer
2	Does the PIA appropriately communicate the purpose of PII in the system and is the purpose justified by appropriate legal authorities?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
3	Do system owners demonstrate appropriate understanding of the impact of the PII in the system and provide sufficient oversight to employees and contractors?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
4	Does the PIA appropriately describe the PII quality and integrity of the data?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
5	Is this a candidate for PII minimization?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
6	Does the PIA accurately identify data retention procedures and records retention schedules?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
7	Are the individuals whose PII is in the system provided appropriate participation?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
8	Does the PIA raise any concerns about the security of the PII?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
9	Is applicability of the Privacy Act captured correctly and is a SORN published or does it need to be?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
10	Is the PII appropriately limited for use internally and with third parties?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
11	Does the PIA demonstrate compliance with all Web privacy requirements?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes	<input type="text"/>	
12	Were any changes made to the system because of the completion of this PIA?	<input type="radio"/> Yes <input type="radio"/> No

Reviewer Questions		Answer	
Reviewer Notes	<input type="text"/>		
General Comments	<input type="text"/>		
OPDIV Senior Official for Privacy Signature	<input type="text"/>	HHS Senior Agency Official for Privacy	<input type="text"/>