Privacy Impact Assessment Form

v 1.47.4

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	Question	Answer
1	OPDIV:	CDC
2	PIA Unique Identifier:	P-2613524-286155
2a	Name:	Import Permit Select Agent System (IPSAS)

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
3a	Identify the Enterprise Performance Lifecycle Phase of the system.	Development
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	Business Steward
		POC Name	Vicky Jackson
		POC Organization	PHPR/DSAT
		POC Email	mvv0@cdc.gov
		POC Phone	770-488-2708

7	Is this a new or existing system?	◉ New ○ Existing
8	Does the system have Security Authorization (SA)?	○ Yes ◉ No
8b	Planned Date of Security Authorization	April 5, 2017 ☐ Not Applicable

11	Describe the purpose of the system.	Public Law 107-188 requires maintenance of a national database of entities that are registered for possession of Select Agents and Toxins, laboratory compliance with national safety guidelines, security measures including controlled access to Select Agents and Toxins, security screening of entities and personnel, and criminal/civil penalties for inappropriate use of Select Agents & Toxins.

The Import Permit Select Agent System (IPSAS) is a joint CDC and USDA Agriculture Select Agent Services (AgSAS) system is designed to control, protect, and store the use, possession and transfer of Select Agents and Toxins. IPSAS maintains information regarding an entity's Select Agent registration. It will replace the current NSAP Information System once it is retired. | |
| 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.) | IPSAS maintains information regarding an entity's Select Agent registration: facility information; a list of select agents or toxins to be possessed, used, or transferred by the entity; a list of individual(s) who will have access to select agents and toxins; characterization of the select agents and toxins; and additional laboratory information. |
| 13 | Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily. | Part of the overall public health mission of the Centers for Disease Control and Prevention (CDC) is to prevent the introduction, transmission and spread of communicable diseases from foreign countries into the United States. is a joint CDC and USDA Agriculture Select Agent Services (AgSAS) system is designed to control, protect, and store the use, possession and transfer of Select Agents and Toxins.

IPSAS is a Project Matrix, Surveillance, and Resource Management Information System for the management and processing of Import Permit (IP) and Select Agent (SA) information. It provides the Select Agent program with the document and records management support in compliance with National Archives and Records Administration (NARA) standards. It also provides for a secure national database and processing environment, to include data entry, scanning and complex reporting capability in support of national incident response or appropriate law enforcement queries.

IPSAS maintains information regarding an entity's (i.e., institution or organization) Select Agent registration: facility information; a list of select agents or toxins to be possessed, used, or transferred by the entity; a list of individual(s) who will have access to select agents and toxins; characterization of the select agents and toxins; and additional laboratory information. | |
| 14 | Does the system collect, maintain, use or share **PII**? | ⦿ Yes ◯ No | |

15	Indicate the type of PII that the system will collect or maintain.	☐ Social Security Number	☒ Date of Birth
		☒ Name	☐ Photographic Identifiers
		☐ Driver's License Number	☐ Biometric Identifiers
		☐ Mother's Maiden Name	☐ Vehicle Identifiers
		☐ E-Mail Address	☐ Mailing Address
		☐ Phone Numbers	☐ Medical Records Number
		☐ Medical Notes	☐ Financial Account Info
		☐ Certificates	☐ Legal Documents
		☐ Education Records	☐ Device Identifiers
		☐ Military Status	☐ Employment Status
		☐ Foreign Activities	☐ Passport Number
		☐ Taxpayer ID	
		DOJ Number	

16	Indicate the categories of individuals about whom PII is collected, maintained or shared.	☐ Employees
		☒ Public Citizens
		☒ Business Partners/Contacts (Federal, state, local agencies)
		☐ Vendors/Suppliers/Contractors
		☐ Patients
		Other

17	How many individuals' PII is in the system?	500-4,999
18	For what primary purpose is the PII used?	The PII is used to assist in identifying an individual for FBI to conduct background check.
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	N/A
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.	Public Health Security and Bioterrorism Preparedness and Response Act of 2002 and The Agricultural Bioterrorism Protection Act of 2002 (Pub. L. 107-188).
22	Are records on the system retrieved by one or more PII data elements?	⦿ Yes ◯ 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:	09-20-0170 National Select Agent Registry (NSAR)/Select Agent Transfer and Entity Registration Information System (SATERIS), HHS/
		Published:	
		Published:	
		☐ In Progress	

23 — Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

- ☐ In-Person
- ☒ Hard Copy: Mail/Fax
- ☐ Email
- ☒ Online
- ☐ Other

Government Sources

- ☒ Within the OPDIV
- ☒ Other HHS OPDIV
- ☒ State/Local/Tribal
- ☐ Foreign
- ☒ Other Federal Entities
- ☐ Other

Non-Government Sources

- ☐ Members of the Public
- ☒ Commercial Data Broker
- ☐ Public Media/Internet
- ☒ Private Sector
- ☐ Other

23a	Identify the OMB information collection approval number and expiration date.	OMB NO. 0579-0213 (APHIS OMB Number) exp 12/31/2018 OMB NO. 0920-0576 (CDC OMB NUMBER) exp 12/31/2018
24	Is the PII shared with other organizations?	◉ Yes ○ No

24a — Identify with whom the PII is shared or disclosed and for what purpose.

- ☐ Within HHS
- ☒ Other Federal Agency/Agencies

  APHIS and CJIS for compliance with federal mandates.
- ☐ State or Local Agency/Agencies
- ☐ Private Sector

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)).	Interconnection Security Agreement, between USDA/APHIS and HHS/CDC. MOU Among CDC, APHIS, and CJIS	
24c	Describe the procedures for accounting for disclosures	Disclosure of any IPSAS records is processed through managerial written/approved procedures. Requests for disclosures are processed and maintained using a SharePoint WorkFlow. An accounting of disclosures is produced by a review of signed transmittal documents.	
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.	The application instructions to USDA/CDC Form 1, Application for Registration for Possession, Use, and Transfer of Select Agents and Toxins, advises that the application will capture information regarding the entity and the Responsible Official (RO), Alternate Responsible Official (ARO), and Owner/ Controller (if applicable). The instructions also indicate what information is needed with regard to these individuals as well as the information that will be required regarding individuals who will have access to the select agents and toxins.	
26	Is the submission of PII by individuals voluntary or mandatory?	○ Voluntary ⦿ Mandatory	
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.	Submission of PII is mandatory. A Security Assessment is required for those individuals identified as a Responsible Official (RO), Alternative Responsible Official (ARO), owners of non-governmental entities, and individuals who want to have access to select agents or toxins. Access to the system may be denied if there is insufficient information to conduct a Security Risk Assessment.	
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.	Notification of any major changes to the system are posted on the Select Agents Web Site as "Select Agent (SA) Grams."	
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.	The process to be followed in the event an individual has concerns regarding the use/accuracy/disclosure of his/her PII is as follows: The user may contact the Business Steward in writing via the address indicated in the SORN. Individuals must reasonably identify the record and specify the information being contested, the corrective action sought, and the reasons for requesting the correction, along with supporting information to show how the record is inaccurate, incomplete, untimely, or irrelevant.	
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.	There is an established daily quality control check of IPSAS. in addition the individual's information is rechecked when the person's access is renewed or information regarding the individual changes.	

31	Identify who will have access to the PII in the system and the reason why they require access.	☒ Users	For initial data entry
		☐ Administrators	
		☒ Developers	To perform Production Operational and Maintenance functions to fix bugs and update logic
		☐ Contractors	
		☐ Others	

32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Role-Based Access (RBAC) is used to determine who may access the system and its PII.
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.	The least privilege model is used to allow those with access to PII to only access the minimum amount of information necessary to perform one's job.
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.	All individuals are required to show a certificate of completion for mandatory Security and Privacy Awareness Training.
35	Describe training system users receive (above and beyond general security and privacy awareness training).	System stewards (Business, Security & DAA) must undergo additional Role Based Training. Users must be verified by the DSAT process and sign the IPSAS Rules of Behavior.
36	Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	⦿ Yes ◯ No
37	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.	Data will be maintained in accordance with a National Archives Records Agency (NARA) compliant Records File Retention and Destruction Plan. The CDC Records Control Schedule (B-321), the Division of Select Agents and Toxins (DSAT) Records Retention Schedule N1-442-06-01. The PII will be retained for the life of the system.
38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	IPSAS stores data in a series of password protected databases hosted in secure environments on encrypted networks. Additional administrative controls are in place to protect the PII with Rules of Behavior, Policies and Procedures including mandatory Security and Privacy Awareness Training. Technical controls are in place with ITSO and OCISO. Logical access barriers include Access Control Lists (ACLs), Active Directory (AD) groups, Firewalls and Intrusion Detection System (IDS). Physical controls are in place through OSSAM including Guards, SmartCard (PIV) access cards for locks, and Closed Circuit Television (CCTV).
39	Identify the publicly-available URL:	TBD

40	Does the website have a posted privacy notice?	◉ Yes ◯ No
40a	Is the privacy policy available in a machine-readable format?	◉ Yes ◯ No
41	Does the website use web measurement and customization technology?	◉ Yes ◯ No

		Technologies	Collects PII?
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)	☐ Web beacons	◯ Yes ◯ No
		☐ Web bugs	◯ Yes ◯ No
		☒ Session Cookies	◯ Yes ◉ No
		☐ Persistent Cookies	◯ Yes ◯ No
		Other... [ ]	◯ Yes ◯ No

42	Does the website have any information or pages directed at children under the age of thirteen?	◯ Yes ◉ No
43	Does the website contain links to non- federal government websites external to HHS?	◯ Yes ◉ No
General Comments	At the time of this PIA review, the website has not been fully developed; therefore, Questions 39-43 cannot be validated. A POA&M is being requested from the responsible program so that the related weaknesses can be monitored through mitigation.	
OPDIV Senior Official for Privacy Signature		