Privacy Impact Assessment Form

v 1.45

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	Question	Answer
1	OPDIV:	CDC
2	PIA Unique Identifier:	P-2727152-422137
2a	Name:	Electronic Disease Notification (EDN)
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.	Operations and Maintenance
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: Technical Steward POC Name: Yoni Haber POC Organization: NCEZID POC Email: dlv8@cdc.gov POC Phone: 404-985-1396
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	1/19/2012 12:00:00 AM

9	Indicate the following reason(s) for updating this PIA. Choose from the following options.	☒ PIA Validation (PIA Refresh/Annual Review) ☐ Significant System Management Change ☐ Anonymous to Non-Anonymous ☐ Alteration in Character of Data ☐ New Public Access ☐ New Interagency Uses ☐ Internal Flow or Collection ☐ Conversion ☐ Commercial Sources

Text box (empty)

10	Describe in further detail any changes to the system that have occurred since the last PIA.	None

11	Describe the purpose of the system.	Immigrants and refugees entering the United States are required by law to possess certain U.S. Department of State medical screening information and documentation as part of a visa request. The medical information is based on overseas examinations to include any of several health related conditions that may exist. The purpose of EDN is to document these health conditions and provide the case to the destination state health department for further follow up and tracking.

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.)	Medical screening information and documentation of immigrants and refugees entering the United States as part of a visa request.

13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	This application will network CDC researchers, quarantine stations, and state health departments that perform surveillance for immigrants requiring medical treatment follow-up upon entering the United States.

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 Alien 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: Aliens
17	How many individuals' PII is in the system?	100,000-999,999
18	For what primary purpose is the PII used?	The primary purpose is for state and local health departments to be able to follow up on migrants with medical conditions that arrive to their jurisdiction..
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 Service Act, Section 301
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: 09-20-0136 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.	1405-0113 Expiration: 09/30/2017

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 ☒ State or Local Agency/Agencies State and Local Health Departments for federally mandated follow-up to persons' arrival in their jurisdiction. ☐ 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)).	N/A

24c	Describe the procedures for accounting for disclosures	The EDN Helpdesk tracks for accounting for disclosures in an Access database. There is also an organized email folder system for requests that come in through the email box.

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.	CDC does not collect the original data. PII and other personal information are collected by the forms of the U.S. Department of State in immigrant or refugee medical exams. Privacy Act Notice on the form states how the information is going to be used. Immigrants or refugees may decline to provide the PII requested by the U.S. Department of State. In that event the U.S. Department of State may delay or prevent the processing of their case.
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.	Immigrants or refugees may decline to provide the PII requested by the U.S. Department of State. In that event the U.S. Department of State may delay or prevent the processing of their case.
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.	Privacy Act Notice on the form states how the information is going to be used.
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.	Immigrants or refugees may notify CDC or state/local health department if their PII is incorrect or inappropriately used.
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.	The review and validation of PII information is done constantly by State and Local Health Departments outside of CDC.
31	Identify who will have access to the PII in the system and the reason why they require access.	☒ Users — Data Entry ☒ Administrators — Maintenance of EDN ☒ Developers — EDN Programming ☒ Contractors — EDN Programming ☐ Others —
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Role-based access. There are 2 system administrators have full access to the system and 15 Data entry personnel to enter data into the system. Other State Health Department and Q-Station users have access only to their state and Q-Station data.
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 privileged model is utilized

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.	Annual security and privacy awareness training	
35	Describe training system users receive (above and beyond general security and privacy awareness training).	CDC Role-based training	
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.	Records are retained and disposed of in accordance with the CDC Records Control Schedule. Record copy of study reports are maintained in agency from two to three years in accordance with retention schedules. Source documents for computer are disposed of when no longer needed by program officials. Personal identifiers may be deleted from records when no longer needed in the study as determined by the system manager, and as provided in the signed consent form, as appropriate. Disposal methods include erasing computer tapes, burning or shredding paper materials or transferring records to the Federal Records Center when no longer needed for evaluation and analysis. Records are retained for 20 years; for longer periods if further study is needed.	
38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	Access to the CDC Clifton Road facility where the mainframe computer is located is controlled by a cardkey system. Access to the computer room is controlled by a cardkey and security code (numeric keypad) system. Access to the data entry area is also controlled by a cardkey system. The hard copy records are kept in locked cabinets in locked rooms. The computer room is protected by an automatic sprinkler system, numerous automatic sensors (e.g., water, heat, smoke, etc.) are installed, and a proper mix of portable fire extinguishers is located throughout the computer room. The system is backed up on a nightly basis with copies of the files stored off site in a secure fireproof safe. Security guard service in buildings provides personnel screening of visitors.	

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?	○ Yes ○ No
Reviewer Notes		
2	Does the PIA appropriately communicate the purpose of PII in the system and is the purpose justified by appropriate legal authorities?	○ Yes ○ No
Reviewer Notes		

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

General Comments	
OPDIV Senior Official for Privacy Signature	
HHS Senior Agency Official for Privacy	