

# Privacy Impact Assessment Form

v 1.21

Status  Form Number  Form Date

Question

Answer

1 OPDIV:

CDC

2 PIA Unique Identifier:

2a Name:

Assessment of Gonorrhoea Case Interviewing in STD Surveillance

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.

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

8b Planned Date of Security Authorization

 Not Applicable

8c	Briefly explain why security authorization is not required	Not applicable
10	Describe in further detail any changes to the system that have occurred since the last PIA.	Not applicable
11	Describe the purpose of the system.	<p>The purpose of this qualitative information collection is to assess the barriers and facilitators contributing to variations in gonorrhea case (GC) interview completion rates among the 10 sexually transmitted disease (STD) Surveillance Network (SSuN) Cycle III jurisdictions.</p> <p>We will 1) document factors contributing to variations in GC case interview completion rates across the SSuN sites, 2) attempt to identify supportive factors that would facilitate interview completion, and 3) use findings to address barriers and implement strategies to improve completion of GC case interviews and develop a plan of action to address key recommendations.</p> <p>Findings from the qualitative interviews will help increase STD program capacity to help Centers for Disease Control (CDC) Division of STD Prevention (DSTDP) identify programmatic changes and provide guidance related to GC interviewing as an SSuN activity and assist relevant SSuN site personnel in a position to use the results to further strengthen their GC interviewing practices.</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>CDC/DSTDP staff involved with this assessment will identify eligible staff through SSuN site Principal Investigators (PIs) and by examining personnel lists. The team will request name, date of birth, phone numbers, and E-Mail address for all staff on the list, and will use that list to recruit participants and invite them to participate and to schedule the in-depth interview. This contact information will be handwritten on paper, and not be computerized on a form.</p>
13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	<p>The planned study design will use purposive, targeted sampling to recruit 50 persons. These 50 staff will be selected from the 10 SSuN sites.</p> <p>Data will be collected from 50 semi-structured, 60-minute long, in-person qualitative interviews. The in-depth interviews will include open-ended questions designed to elicit information on the factors related to GC case interview completion to help document facilitators and barriers, and their perspectives on the SSuN GC interviewing activity in their jurisdiction. Interview questions will examine staff characteristics (i.e., training, job background, responsibilities), attitudes and perceptions towards interviewing, interview processes and procedures, and community context (e.g., health department reputation, over-sampling).</p> <p>Although name, date of birth, phone number, and email address data are collected, they will not be transmitted to CDC nor will any record be retrievable by any element of PII. None of the PII is linked to the study questions or study data.</p>

<p>14 Does the system collect, maintain, use or share <b>PII</b>?</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 checked="" 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 checked="" 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 checked="" type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies) <input 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="&lt;100"/></p>																												
<p>18 For what primary purpose is the PII used?</p>	<p><input type="text" value="The primary purpose of PII is to identify and recruit appropriate staff from the SSuN sites to participate in the assessment."/></p>																												
<p>19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)</p>	<p><input type="text" value="Not applicable"/></p>																												
<p>20 Describe the function of the SSN.</p>	<p><input type="text" value="Not applicable"/></p>																												
<p>20a Cite the <b>legal authority</b> to use the SSN.</p>	<p><input type="text" value="Not applicable"/></p>																												
<p>21 Identify <b>legal authorities</b> governing information use and disclosure specific to the system and program.</p>	<p><input type="text" value="This request is authorized by Title III – General Powers and Duties of the Public Health Service, Section 301 (241.)a. Research and investigations generally."/></p>																												
<p>22 Are records on the system retrieved by one or more PII data elements?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>																												

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.

0290-0840 (18AVE)

24 Is the PII shared with other organizations?

Yes

No

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.

PIs will provide the initial gateway to approach staff for participation. CDC/DSTDP staff involved with this assessment will identify eligible staff through SSuN site PIs and by examining personnel lists. The study team will request name and contact information for all staff on the list, and will use that list to recruit participants and invite them to participate and to schedule the in-depth interview.

At the beginning of the in-depth interview, a member of the DSTDP team will review the purpose of the assessment with the participant and answer any questions they might have. The participant will be asked to provide signed informed consent. This includes permission to audio record the interview.

The consent process which is a discussion between the participant and the study staff notifies individuals that their name will not be recorded and anything said during the interview will be confidential and will not be shared with other staff or supervisors. Their name also will not be used when discussing their responses with others. The information provided will be stored securely and will only be available to members of the study team.

26 Is the submission of PII by individuals voluntary or mandatory?

Voluntary

Mandatory

<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>Participants may withdraw or revoke their participation at any time. This will be done during the interview or by sending a written notice to the DSTDP team. Recruitment contact information is separate from the study data. If participants withdraw their permission, no new information will be gathered and the participant will not participate in the assessment.</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>Individuals can be contacted via phone or email by the DSTDP team to notify them of any major changes to the system.</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>Participants will be provided contact information and instruction to contact either the PIs or CDC's Human Research Protection Office.</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>Participants' contact information to schedule the in-depth interview will be handwritten on paper, and not be computerized on a form. When not in active use, the papers containing the contact information will be stored in locked cabinets separate from other study data at the CDC/DSTDP team office. These papers with the participant's contact information will be destroyed after the interview is completed and the interview data have been fully transcribed and verified for accuracy.</p> <p>The DSTDP team will confirm the accuracy of the information each time they contact a participant by phone, email, and/or during study visits. If staff are unable to contact the participant after multiple attempts, the participant will be withdrawn from recruitment attempts.</p>	
<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<p><input checked="" type="checkbox"/> Users  <input type="checkbox"/> Administrators  <input type="checkbox"/> Developers  <input type="checkbox"/> Contractors  <input type="checkbox"/> Others</p>	<p>Users include the DSTDP team involved in the assessment for  <input type="text"/>  <input type="text"/>  <input type="text"/>  <input type="text"/></p>
<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>Roles and responsibilities to access PII will be limited to study investigators accessing recruitment and interview data.</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>Access to PII will be restricted to Institutional Review Board (IRB) individuals trained in human subject protections. All PII is collected for a specific and identifiable purpose with access restricted to specific job tasks and individuals who perform those tasks. Access to PII in study data collected for the purposes of analysis is limited to the study investigators.</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.	CDC personnel are required to complete the annual Security and Privacy Awareness Training to make them aware of their responsibilities for protecting the information being collected and maintained.
35 Describe training system users receive (above and beyond general security and privacy awareness training).	As part of the IRB approval process, interviewers submit proof of completion of recent ethics training. This process involves substantial content regarding privacy and confidentiality. Interviewers also must commit to CDC that they will comply with Health and Human Services Protection of Human Subjects regulations 45 CFR part 46.  All CDC staff involved in the conduct of federally funded human subjects research must complete select in-depth scientific and ethics trainings, including sections on privacy and confidentiality, via the Collaborative Institutional Training Initiative (CITI) based on the type of research on which study staff are engaged as required by the IRB for engaging human subjects research.
36 Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	<input checked="" type="radio"/> Yes <input type="radio"/> No
37 Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.	CDC uses the CDC Records Control Schedule for determining retention and destruction of PII, specifically, section 04-4-40 Surveillance Report of STD Activity, which prescribes that records be retained and destroyed when no longer needed for administrative or research purposes or when 30 years old, whichever comes first.

38 Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

**Technical**  
Access to the server is controlled using individual access controls and only authorized users will have access to the data.

**Administrative**  
The CDC study team has defined that roles and responsibilities to access PII is limited to only study investigators who will have access to recruitment and interview data.

**Physical**  
CDC data will be stored on a secured server at a facility protected by guards. Additional protections include Personal Identification Verification (PIV) card access protections. Guards are also located inside buildings to control ingress and egress.

Participants will be invited to provide their contact information in order to schedule the in-depth interview. This contact information will be handwritten on paper, and not be computerized on a form. When not in active use, the papers containing the contact information will be stored in locked cabinets separate from other study data at the CDC/DSTDP team office. These papers with the participant’s contact information will be destroyed after the interview is completed and the interview data have been fully transcribed and verified for accuracy.

All interview audio files will be stored on the recorders; interview notes (not full transcripts) will be done in house by DSTDP team members by listening to the recording device and supplementing handwritten notes to stand-alone computers that are not networked, taking care to remove any PII that may have been transcribed accidentally. No final interview transcript or other computerized data file will contain any PII from the participant.

**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
<i>Reviewer Notes</i>	<input type="text"/>	
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
<i>Reviewer Notes</i>	<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
<i>Reviewer Notes</i>	<input type="text"/>	

Reviewer Questions		Answer
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 Notes	<input type="text"/>	
General Comments	<input type="text"/>	



OPDIV Senior Official  
for Privacy Signature

HHS Senior  
Agency Official  
for Privacy