

# Privacy Impact Assessment Form

v 1.21

Status Form Number Form Date 

Question

Answer

1 OPDIV:

2 PIA Unique Identifier:

2a Name:

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.

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	
10	Describe in further detail any changes to the system that have occurred since the last PIA.	N/A, new PIA request for Reinstatement ICR.
11	Describe the purpose of the system.	<p>The purpose of this data collection -- a survey of family-planning healthcare providers and administrators -- is to support CDC's efforts to monitor changes in attitudes and practices among family planning providers and clinics.</p> <p>The survey will assess diffusion and use of federal contraception prescribing guidelines published in August 2016 in clinical practice, as well as attitudes. This information will be used by CDC to understand current attitudes and practices of providers as well as any persisting misconceptions and/or gaps in clinic-level practices (e.g., low provision of preconception health services) that may warrant continued and more tailored dissemination and educational activities.</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>Questionnaire domains include healthcare providers' safety attitudes; clinical practices; sources of information and tools; awareness of guidelines; health center systems and programs; demographics and training.</p> <p>A unique identifier will be assigned to each response by the data collection contractor .</p> <p>CDC will provide the contractor with business contact information (name, address, phone, email address) from pre-existing data sources. This information already exists; it is not being collected by this project.</p>
13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	<p>PII in the form of contact information will be used to invite healthcare providers to participate in the survey. CDC will use the American Medical Association's (AMA) Physician Masterfile and a national database of public-sector family planning providers to obtain names, addresses, phone numbers and email addresses [where available] of physicians and health centers. CDC will provide this information to the data collection contractor which will assign a unique identification number (UID) to each respondent. For tracking responses during the collection period, the contractor will maintain the link between the UID and contact information in a password-protected file that is not shared with CDC or any other party. The PII will not be included in the file of survey responses. CDC will not be able to identify respondents based on their UID at any time.</p> <p>Survey data will be transmitted to CDC at the end of the data collection period. The survey responses will be used to make evidence-based recommendations that promote awareness and adoption of existing guidance into practice through additional dissemination activities and development of educational interventions and provider tools.</p>
14	Does the system collect, maintain, use or share PII?	<input checked="" type="radio"/> Yes <input type="radio"/> No

15	Indicate the type of PII that the system will collect or maintain. <input type="checkbox"/> Social Security Number <input checked="" type="checkbox"/> Name <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Mother's Maiden Name <input checked="" type="checkbox"/> E-Mail Address <input checked="" type="checkbox"/> Phone Numbers <input type="checkbox"/> Medical Notes <input type="checkbox"/> Certificates <input type="checkbox"/> Education Records <input type="checkbox"/> Military Status <input type="checkbox"/> Foreign Activities <input type="checkbox"/> Taxpayer ID <input type="checkbox"/> Date of Birth <input type="checkbox"/> Photographic Identifiers <input type="checkbox"/> Biometric Identifiers <input type="checkbox"/> Vehicle Identifiers <input checked="" type="checkbox"/> Mailing Address <input type="checkbox"/> Medical Records Number <input type="checkbox"/> Financial Account Info <input type="checkbox"/> Legal Documents <input type="checkbox"/> Device Identifiers <input type="checkbox"/> Employment Status <input type="checkbox"/> Passport Number <input type="text"/> <input type="text"/> <input type="text"/>
16	Indicate the categories of individuals about whom PII is collected, maintained or shared. <input type="checkbox"/> Employees <input type="checkbox"/> Public Citizens <input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies) <input type="checkbox"/> Vendors/Suppliers/Contractors <input type="checkbox"/> Patients Other <input type="text" value="Physicians, Other Health Care Providers, and Health Clinic Administrators"/>
17	How many individuals' PII is in the system? <input type="text" value="5,000-9,999"/>
18	For what primary purpose is the PII used? <input type="text" value="PII in existing databases will be used for the sole purpose of contacting survey participants."/>
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research) <input type="text" value="N/A"/>
20	Describe the function of the SSN. <input type="text" value="NA"/>
20a	Cite the <b>legal authority</b> to use the SSN. <input type="text" value="NA"/>
21	Identify <b>legal authorities</b> governing information use and disclosure specific to the system and program. <input type="text" value="Section 301 of the Public Health Service Act [42 U.S.C. 241]"/>
22	Are records on the system retrieved by one or more PII data elements? <input type="radio"/> Yes <input checked="" type="radio"/> No

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.

Reinstatement of OMB Number 0920-0969; Expiration Date 05/31/2014.

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.

N/A, no PII is being collected from individuals. PII comes from pre-existing data sources external to CDC.

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.

CDC is purchasing pre-existing lists of providers' contact information. The contact list brokers are responsible for the opt-out process regarding the initial collection of contact information. For the AMA Physician Masterfile, physicians voluntarily chose to provide their contact information. For the national data base of public-sector family planning health centers, clinics voluntarily chose to provide their contact information.

There is no opt-out process because the first contact with the respondent involves the use of the PII. When contacted, potential respondents may opt out of participating in the survey.

<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>CDC does not have a process in place to notify the providers about any changes to the data collection because the PII is not owned or controlled by CDC but was purchased from pre-existing lists.</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 source of the PII is not owned or controlled by CDC. Participants must contact the data broker to resolve any concerns.</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>No process is in place because all PII will be destroyed within eight months after the end of the data collection period.</p>	
<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<p><input type="checkbox"/> Users</p> <p><input type="checkbox"/> Administrators</p> <p><input type="checkbox"/> Developers</p> <p><input checked="" type="checkbox"/> Contractors</p> <p><input type="checkbox"/> Others</p>	<p><input type="text"/></p> <p><input type="text"/></p> <p><input type="text"/></p> <p>Contractor will use the PII to contact the participants.</p> <p><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>The project director will determine the limited number of staff who has access to the PII based on specific roles and responsibilities. A user's access is limited to the information which is essential to their job functions.</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>Only those contractor staff who are responsible for recruiting respondents will have access to the file with PII for the purpose of sending out the initial mailing and following up with non-responders.</p> <p>Technical (i.e., password-protected files) and administrative controls will be used to protect respondent information.</p> <p>CDC will use a password-protected electronic file to transmit the names, addresses, phone numbers and email addresses of physicians and health centers selected to participate in the survey to the contractor. The password to unlock the file will be provided to the contractor via telephone and not in written form (technical control).</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>CDC staff complete Security and Privacy Training on an annual basis. The contractors will complete in-house security awareness and privacy training.</p>	
<p>35 Describe training system users receive (above and beyond general security and privacy awareness training).</p>	<p>N/A</p>	

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.

All PII will be destroyed within eight months after the end of the data collection period. Paper-copy survey data will be entered into electronic databases (one for the provider survey and one for the health center administrator survey). The two databases, stripped of any identifiers other than the UID, will be permanent federal records and will be maintained in accordance with Records Control Schedule DAA-GRS-2-13-0002-0008.

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

Administrative:  
The password to unlock the file with PII will be provided to the contractor via telephone and not in written form. The contractor will assign each participant a UID number. Surveys will only have the UID number, and the contractor will be the sole source of a password-protected electronic file linking sampled physicians and health centers with their assigned UIDs.

Information held by the contractor is housed on a network that is controlled and protected through strict administrative controls.

At CDC, password protection will impose user name and password log in requirements to prevent unauthorized access. Each user name will be assigned limited access rights to files and directories at varying levels to control file sharing.

Technical:  
Access to the contractor's web-based server requires two-factor authentication and advanced, complex passwords with strict established rules. Non-admin users are prevented from sharing any company owned or managed files. In the event of a data breach or loss of company owned equipment, the IT Manager will initiate a remote wipe which will delete all company data and any local copies of files from a computer when that computer comes online.

Physical:  
Computer facilities at all sites have restricted access and are protected from potential fire or water damage.

**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 checked="" type="radio"/> Yes <input type="radio"/> No

Reviewer Notes

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 checked="" 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 checked="" 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 checked="" type="radio"/> No
Reviewer Notes	<input type="text"/>	
5	Is this a candidate for PII minimization?	<input type="radio"/> Yes <input checked="" 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 checked="" 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	
<i>Reviewer Notes</i>	<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"/>