

# Privacy Impact Assessment Form

v 1.21

Status  Form Number  Form Date

Question

Answer

1 OPDIV:

CDC

2 PIA Unique Identifier:

TBD

2a Name:

Communities Organized for the Prevention of Arboviruses (COP)

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   
 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.	None
11	Describe the purpose of the system.	<p>The National Center for Emerging and Zoonotic Infectious Diseases (NCEZID)-Division of Vector Borne Diseases (DVBD) - Dengue Branch (DB) is developing the Communities Organized for the Prevention of Arboviruses (COPA) system to collect, manage and analyze data related to the knowledge, attitudes and practices from communities potentially hosting viral diseases transmitted to humans by infected mosquitoes i.e., Dengue, West Nile, chikungunya, Yellow Fever, and Zika and assist in the arboviral prevention and control.</p> <p>The objective of COPA is to collect data on what actions an individual will take once bitten by mosquitoes, to demonstrate and ability to recognize and eliminate breeding containers and to educate residents about Dengue mosquito and arboviral prevention and control within the community. Primary focus is to communicate prevention and control. The goal is to ensure that these changes will ultimately translate into a significant decrease in disease risk and transmission and to recognize it could influence people’s ability to get early medical treatment because mosquito bites are not considered a threat to life.</p> <p>Data is collected from participants of randomly selected households in communities potentially hosting mosquito borne viral diseases. Heads of household will give general information related to the household and participating individuals will offer information related to their personal mosquito bite prevention behaviors.</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>COPA data are entomological surveys conducted to measure response and action in population areas where mosquitoes could potentially transmit viral disease infections to humans i.e., Dengue, West Nile, Chikungunya, Yellow Fever, and Zika.</p> <p>Data will be collected from randomly selected households with individuals supplying information related to their mosquito bite prevention behaviors, whether or not they know about Dengue, how it is spread, and if they can identify breeding sites. The system will collect Name, DOB, Phone Numbers, E-mail/Physical Address, GPS coordination, and Dwelling type. The user access to CDC is using user ID and Password to upload data.</p>

13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

COPA is a Tablet-based EpiInfo survey tool, a statistical software for epidemiology developed by the CDC. The objective of COPA is to collect data on what actions an individual will take once bitten by mosquitoes or demonstrate ability to recognize and eliminate breeding containers and educating residents about dengue mosquito and arboviral prevention and control by community residents.

Data will be analyzed by Dengue Branch epidemiologists and study personnel. CDC Dengue Branch will be the steward/ owner of the data processed by this system. The data will be used by epidemiologists and study personnel to understand mosquito prevention behaviors in the community study and evaluate future interventions for the prevention of arboviral diseases.

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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
  - Name
  - Driver's License Number
  - Mother's Maiden Name
  - E-Mail Address
  - Phone Numbers
  - Medical Notes
  - Certificates
  - Education Records
  - Military Status
  - Foreign Activities
  - Taxpayer ID
  - Date of Birth
  - Photographic Identifiers
  - Biometric Identifiers
  - Vehicle Identifiers
  - Mailing Address
  - Medical Records Number
  - Financial Account Info
  - Legal Documents
  - Device Identifiers
  - Employment Status
  - Passport Number
- HHS User Credential Information
- 
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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?

18 For what primary purpose is the PII used?

General Public: PII is used for mosquito mitigation behavior analysis.  
 HHS User Credentials are used to identify the CDC employee conducting the collection of data.

19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)

20 Describe the function of the SSN.

20a Cite the **legal authority** to use the SSN.

21 Identify **legal authorities** governing information use and disclosure specific to the system and program.

22 Are records on the system retrieved by one or more PII data elements?  Yes  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.	In Progress.										
24 Is the PII shared with other organizations?	<input type="radio"/> Yes <input checked="" type="radio"/> 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.	CDC requires non-governmental participants in the COPA survey to give consent with the research or public health event by capturing a certified electronic signature from each participant in the research protocol or study beforehand. Individuals participating in COPA survey grant consent through the COPA Consent Form.										
26 Is the submission of PII by individuals voluntary or mandatory?	<input checked="" type="radio"/> Voluntary <input type="radio"/> 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.	Individuals may choose not to participate by refusing to sign the consent form.  Collection of employees Non-Sensitive Internal CDC Business Contact Information related contact information is for user identification with assigned responsibility in order to perform specific functions of their employment.										
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.	The information is collected using the Consent Forms. Any major changes would be explained in those forms thereby giving the appropriate notice.										
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 CDC's DVBD COPA surveys provide individuals with a Consent Form based on purpose of collected information. The Consent Form lists Points of Contact for responding to an individual's concern on contesting accuracy of information collected and how to correct their submitted information. The CDC will review concerns and respond to resolve inquiry of the individual.										
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 system administrator performs database monitoring and maintenance when new data is entered into the system or changes are requested by the users.  Security controls are reviewed during the annual security self-assessments and recertification process.										
31 Identify who will have access to the PII in the system and the reason why they require access.	<table border="0"> <tr> <td><input checked="" type="checkbox"/> Users</td> <td>Users (Investigators) collecting the PII and those performing analysis on the</td> </tr> <tr> <td><input checked="" type="checkbox"/> Administrators</td> <td>Oversee users and evaluate findings.</td> </tr> <tr> <td><input type="checkbox"/> Developers</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Contractors</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Others</td> <td></td> </tr> </table>	<input checked="" type="checkbox"/> Users	Users (Investigators) collecting the PII and those performing analysis on the	<input checked="" type="checkbox"/> Administrators	Oversee users and evaluate findings.	<input type="checkbox"/> Developers		<input type="checkbox"/> Contractors		<input type="checkbox"/> Others	
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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>System Administrators in coordination with Business Steward will assign designated collection survey teams for read/write to data fields and Subject Matter Experts for role based transactional user's access to analyze collective input. For example, collected data will be analyzed by Dengue Branch epidemiologists and study personnel for analytical assessment based on specific need to know.</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>Least privilege, Role Based Access methods are used to allow those with access to PII to only access the minimum amount of information necessary to perform their job. The system administrator is responsible for setting up the user access to the system based on the CDC user ID and the permissions assigned to it.</p> <p>The HHS credentialed employee PII data is identified as non-Sensitive Internal Business information (Identified by name and CDC issued UserID) and limited to authorized Administrators and Subject Matter Experts.</p> <p>Role-based - Access to PII is strictly enforced by setting up user profile. Individuals can see selected functions and information based on their user profile. This applies to geographical location, system module and role.</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>All CDC personnel are required to complete annual Security and Privacy Awareness Training.</p>	
<p>35 Describe training system users receive (above and beyond general security and privacy awareness training).</p>	<p>Users with significant security and privacy responsibilities are provided additional CDC and system specific Role-Based training.</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>	
<p>37 Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.</p>	<p>The records are maintained in accordance with General Records Schedule (GRS) 20.6</p>	

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

Administrative controls: Completion of training requirements; risk analyses performed annually; branch management reviewing access requests and granting minimal amount of access.

Technical controls: Users are authenticated and data secured using operating system and server security, administered by the local system administrator. PII data is encrypted at rest and in transits with access restricted to specific authorized users as required by HHS and CDC policy.

Physical controls: Facility access controls; server protected in a guarded building.

**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 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
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"/>	

Reviewer Questions		Answer	
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	<input type="text"/>	HHS Senior Agency Official for Privacy	<input type="text"/>