

Privacy Impact Assessment Form

v 1.47.4

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

11 Describe the purpose of the system.	The Traumatic Brain Injury Surveillance System (TBISS) is being implemented as a means to accurately determine how many children and adults experience a traumatic brain injury (TBI) each year in the United States, to collect information about the circumstances of the TBI, and to identify groups most at risk for TBI. By administering the surveillance system over time, the surveillance system can monitor trends and allow for an understanding of whether TBIs are increasing or decreasing, and whether prevention efforts are effective.	
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.)	The data collected will include first names, phone numbers and email addresses, as well as information from the respondents regarding their experiences with TBI.	
13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	<p>The TBI surveillance system is a computer-assisted and web interviewing platform for data analysis and sample processing. The system will be used to accurately determine how many children and adults experience a TBI each year in the United States, to collect information about the circumstances of the injury, and to identify groups most at risk for TBI. By administering this survey, the system will be able to monitor trends and show if TBIs are increasing, decreasing, and whether prevention efforts are effective.</p> <p>The data collected will include first names, phone numbers, and email addresses, as well as information from the respondents regarding their experiences with TBI. The data will be collected by Computer-Assisted Telephone Interview (CATI) and Web Interview (CAWI). The raw data will not be exported outside the system. Summary analyses of trends and statistics, which do not contain PII, will be sent to the CDC. The TBI surveillance system will collect and or store, but not share, phone numbers, names, and email addresses.</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 type="checkbox"/> Date of Birth
<input 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	

16 Indicate the categories of individuals about whom PII is collected, maintained or shared.

<input type="checkbox"/> Employees
<input checked="" 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"/>

17 How many individuals' PII is in the system?

18 For what primary purpose is the PII used?

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.

Submitted but still pending.

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.

A disclosure notification will be part of the script read to adult respondents. The preference is for the adolescent respondent to complete their own survey at the time of the initial survey with their parent. If the adolescent is not available, the script will ask the parent/guardian on the phone for a cell phone number and email address for the 13-17 year old. Only after obtaining permission from the parent, will interviewers record the contact information for the adolescent in the household.

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.

Respondents can refuse to answer any question that they do not want to answer. Additionally, we will collect recontact information for adolescents only after a parent/guardian gives consent for their child to participate in the survey. Only after obtaining permission from the parent, will interviewers record the contact information for the adolescent in the household. Further, even if the parent consents, the child can still refuse to provide assent, and can likewise decline to answer any question he or she does not want to answer.

<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>The parents will be notified if there are any major changes to the system or the PII maintained within 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>Any issues experienced by survey participants would be initiated by the adolescent's parent or guardian and resolved through the local Institutional Review Board (IRB).</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>The database/web administrator periodically reviews and compares the PII contained in the system against the spreadsheets/database to ensure the data's integrity, availability, accuracy and relevancy.</p>										
<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<table border="1"> <tr> <td data-bbox="727 632 954 751"> <input checked="" type="checkbox"/> Users </td> <td data-bbox="954 632 1414 751"> <p>The users will have access only to their own information when submitting responses to the survey.</p> </td> </tr> <tr> <td data-bbox="727 751 954 1003"> <input checked="" type="checkbox"/> Administrators </td> <td data-bbox="954 751 1414 1003"> <p>Server Administrators and Domain Administrators have full local admin access to all servers, as required to support the systems and administer other server and domain user privileges, as well as support database application and backup process.</p> </td> </tr> <tr> <td data-bbox="727 1003 954 1073"> <input type="checkbox"/> Developers </td> <td data-bbox="954 1003 1414 1073"> </td> </tr> <tr> <td data-bbox="727 1073 954 1142"> <input type="checkbox"/> Contractors </td> <td data-bbox="954 1073 1414 1142"> </td> </tr> <tr> <td data-bbox="727 1142 954 1556"> <input checked="" type="checkbox"/> Others </td> <td data-bbox="954 1142 1414 1556"> <p>Data Analysts require access to process and analyze the data and to upload list data to the dialer. Telephone Interviewers will need to enter the data into the collection system, but will have access only to one respondent's replies at a time, and only while on the phone with the respondent. Supervisors over the telephone interviewers are able to listen to interviews for quality control (QC) purposes.</p> </td> </tr> </table>	<input checked="" type="checkbox"/> Users	<p>The users will have access only to their own information when submitting responses to the survey.</p>	<input checked="" type="checkbox"/> Administrators	<p>Server Administrators and Domain Administrators have full local admin access to all servers, as required to support the systems and administer other server and domain user privileges, as well as support database application and backup process.</p>	<input type="checkbox"/> Developers		<input type="checkbox"/> Contractors		<input checked="" type="checkbox"/> Others	<p>Data Analysts require access to process and analyze the data and to upload list data to the dialer. Telephone Interviewers will need to enter the data into the collection system, but will have access only to one respondent's replies at a time, and only while on the phone with the respondent. Supervisors over the telephone interviewers are able to listen to interviews for quality control (QC) purposes.</p>
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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>Role Based Access Control (RBAC) is used to determine who has access to PII.</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>The Least Privilege model is utilized allow those with access to PII to only access the minimum amount of information necessary to perform their job.</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.	All project staff are required to take annual training in cybersecurity, security awareness, privacy training, and Ethics training. This training has been reviewed and is compatible with CDC requirements and in accordance with contractual agreement.	
35 Describe training system users receive (above and beyond general security and privacy awareness training).	All project staff receive system specific training on system use. This training has been reviewed and is compatible with CDC requirements.	
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.	Records are retained and disposed of in accordance with the CDC Records Control Schedule and in accordance with contractual agreement. 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. (Record Schedule N1-442-09-1)	
38 Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	Administrative controls include a system security plan, contingency plan, regular back up of files and storage of backups off site, role-based security awareness training, least privilege access enforced through Active Directory groups, separate user and privileged accounts for administrators, policies and procedures in place for retention and destruction of PII, and a corporate incident response team and incident response plans. Technical controls include identification and authentication using unique user IDs, passwords, and smart cards, use of firewalls and intrusion detection/prevention systems, virus scanning software on all computers, and a SIEM solution. Physical controls include guards, identification badges, key cards, and closed circuit TV.	
39 Identify the publicly-available URL:	https://www.headinjurysurvey.com	
40 Does the website have a posted privacy notice?		<input checked="" type="radio"/> Yes <input type="radio"/> No
40a Is the privacy policy available in a machine-readable format?		<input checked="" type="radio"/> Yes <input type="radio"/> No
41 Does the website use web measurement and customization technology?		<input type="radio"/> Yes <input checked="" type="radio"/> 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

OPDIV Senior Official for Privacy Signature