

Privacy Impact Assessment Form

v 1.21

Status Form Number Form Date

Question

Answer

1 OPDIV:

CDC

2 PIA Unique Identifier:

TBD

2a Name:

Minimum Data Elements (MDEs) for the National Breast and Cer

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.

Initiation

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

tbd

 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, there was no prior PIA.
11	Describe the purpose of the system.	CDC will collect "Minimum Data Elements" (MDEs) from the 70 grantees participating in the CDC-funded National Breast and Cervical Cancer Early Detection Program (NBCCEDP). The MDEs are patient-level data on the delivery of screening and diagnostic clinical services through the program. Information will be used by CDC to monitor and evaluate the NBCCEDP, provide feedback to grantees for program improvement, provide summary data to stakeholders on outcomes, and inform program planning.
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 MDEs include seven categories of elements: 1. Patient demographics (race/ethnicity, date of birth (to calculate age), location codes of residence) 2. Breast cancer screening 3. Cervical cancer screening 4. Breast and cervical cancer diagnoses 5. Breast and cervical cancer treatment 6. Timeliness of services 7. Patient navigation
13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	Grantees report aggregate cancer screening and diagnostic follow-up data. Data elements are limited to those needed to adequately monitor program performance in screening and timely links to treatment for the populations served by NBCCEDP. Analysis of the data is conducted to assess how well the program is meeting its goals. CDC uses this information for decision-making in program management. Grantee respondents receive customized feedback from CDC. Program summary information and NBCCEDP aggregate results (e.g., performance ranges) will be shared across programs for grantees to compare performance to the NBCCEDP as a whole. CDC will periodically prepare reports on aggregated data for Congress and publication. Individual-level data will not be reported. The dataset will not be shared.
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"/> 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 type="checkbox"/> E-Mail Address	<input type="checkbox"/> Mailing Address
<input 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"/>
<input type="text" value="City, State, and/or Zip Code"/>	<input type="text"/>
<input type="text" value="Race/ethnicity"/>	<input type="text" value="Other..."/>

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?

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

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:

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.

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
- 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)).

24c Describe the procedures for accounting for disclosures

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.

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>Participation in screening and follow-up, and providing information to do so, is voluntary. Those who wish to opt out may do so.</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>There is no process. Individuals cannot be notified because CDC does not have individuals' contact information.</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>There is no process. CDC would be unable to address such concerns because it is unable to identify individual participants from the data received.</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>Patient-level data are de-identified before submission to CDC except for date of birth. Therefore, periodic reviews are not warranted.</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 <input type="text"/> <input type="checkbox"/> Administrators <input type="text"/> <input type="checkbox"/> Developers <input type="text"/> <input checked="" type="checkbox"/> Contractors <input type="text" value="project staff who perform data collection and compilation."/> <input type="checkbox"/> Others <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>Access to PII is limited to the contractor's project staff with authorization based on their role.</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 contractor defines access to PII based on the need to convert date of birth to age.</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 of the contractor's project staff are required to sign a confidentiality agreement before being given access.</p>
<p>35 Describe training system users receive (above and beyond general security and privacy awareness training).</p>	<p>None.</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>

37 Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.

Data will be destroyed within 3 years after the end of the funding cycle (2022). This applies to CDC and CDC's contractor.

Disposition authority: general records schedule is DAA-GRS-2013-0002-0008 ("Disposition instructions: Temporary. Destroy 3 years after project activity or transaction is completed or superseded but longer retention is authorized if needed for business use. ").

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

Administrative: Periodic review and update of the contractor's security processes is conducted to identify any needed changes. The contractual agreement includes non-disclosure terms.

Technical: Contractor's server is password-protected. Once information has been compiled by the contractor and delivered to CDC via courier, all data are maintained for restricted access on CDC's secure server with access permission granted by the CDC NBCCEDP data manager.

Physical: The contractor's server is housed in a secure facility with restricted access. Any storage media containing data are stored under lock and key. CDC's server is housed in a secure facility.

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 checked="" type="radio"/> No
<i>Reviewer Notes</i>	Question 8C: Unacceptable response, revise and provide necessary information, if this is an existing system please provide, including ATO, clarify why this is being viewed as 2 different processes? Question 12: Please revise and specify what demographics specifically are collected-see handbook for guidance Question 13: Please revise, based on info spelled out in Q. 12 and clarify accordingly per HHS guidance	
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"/>	
4	Does the PIA appropriately describe the PII quality and integrity of the data?	<input type="radio"/> Yes <input type="radio"/> No
<i>Reviewer Notes</i>	<input type="text"/>	

Reviewer Questions		Answer	
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" value="The issues noted in the Reviewer's note were corrected prior to the acceptance/approval of this PIA"/>		
OPDIV Senior Official for Privacy Signature	<input type="text"/>	HHS Senior Agency Official for Privacy	<input type="text"/>