

# Privacy Impact Assessment Form

v 1.21

Status  Form Number  Form Date

Question

Answer

1 OPDIV:

CDC

2 PIA Unique Identifier:

NA

2a Name:

Using social media for recruitment in cancer prevention and con

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
11	Describe the purpose of the system.	<p>This is a one-time data collection using web-based surveys of adults recruited via targeted social media and web ads using Facebook, Twitter, and Google. The goal of the study is to assess the feasibility of conducting survey-based research on cancer prevention and control using these modes for subject recruitment. Target populations for these surveys include the general population (for cancer screening), cancer survivors, and those at high risk for cancer. If feasible, finding specialized populations for cancer prevention and control research using social media is likely to yield a higher sample size and be more cost-effective than other methods of subject recruitment such as relying on finding these persons in the general population or within a managed care organization. Data will be collected by a contractor to CDC.</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>The bulk of the information collected in the system will be responses to survey questions related to demographics (race, state, zip code), health, well being, and health behaviors. In addition, survey questions will also address cancer screening, cancer survivorship, and genetic counseling and testing for cancer risk.</p> <p>PII (name and email address) will be collected in order to deliver survey incentives and invite participants to participate in a follow-up survey. IP addresses will only be used to ensure that the same respondent is not taking the survey multiple times. Zip code will be used to create survey weights, but will not be analyzed individually or delivered to CDC by the contractor.</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 data will be analyzed to assess the feasibility of this mode of recruitment for research. Specifically, statistical analyses will be conducted on the aggregated data to assess the extent of sampling bias associated with surveys using social media platforms as sampling frames and the ability to use weights or other statistical methods to correct for potential biases. Demographic information will enable construction of statistical weights and comparison of findings with surveys of nationally representative populations.</p> <p>The individually identifiable information will only reside at the contractor site and never be delivered or shared with CDC. Participant e-mail addresses, and IP addresses will be deleted by the contractor at the end of the data collection period. Respondent names and mailing addresses will be deleted once all survey incentives have been mailed. Respondent zip code will be used to create statistical weights and will be deleted once the weight variable is finalized. All PII collected will be deleted by the contractor and never sent to CDC.</p>
14	Does the system collect, maintain, use or share PII?	<p><input checked="" type="radio"/> Yes</p> <p><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 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 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="IP address"/></td> </tr> <tr> <td><input type="text" value="City, State, and/or Zip Code"/></td> <td><input type="text" value="Other..."/></td> </tr> <tr> <td><input type="text" value="race/ethnicity"/></td> <td><input type="text" value="Other..."/></td> </tr> </table>	<input type="checkbox"/> Social Security Number	<input 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 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="IP address"/>	<input type="text" value="City, State, and/or Zip Code"/>	<input type="text" value="Other..."/>	<input type="text" value="race/ethnicity"/>	<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>	<table border="0"> <tr> <td><input type="checkbox"/> Employees</td> </tr> <tr> <td><input checked="" type="checkbox"/> Public Citizens</td> </tr> <tr> <td><input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies)</td> </tr> <tr> <td><input type="checkbox"/> Vendors/Suppliers/Contractors</td> </tr> <tr> <td><input type="checkbox"/> Patients</td> </tr> <tr> <td>Other <input type="text"/></td> </tr> </table>	<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"/>																						
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<p>17 How many individuals' PII is in the system?</p>	<input type="text" value="500-4,999"/>																												
<p>18 For what primary purpose is the PII used?</p>	<input type="text" value="Participant name and email address will only be used to deliver survey incentives and remind participants to complete their survey or invite them to participate in a follow-up survey."/>																												
<p>19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)</p>	<input type="text" value="N/A"/>																												
<p>20 Describe the function of the SSN.</p>	<input type="text" value="N/A"/>																												
<p>20a Cite the <b>legal authority</b> to use the SSN.</p>	<input type="text" value="N/A"/>																												
<p>21 Identify <b>legal authorities</b> governing information use and disclosure specific to the system and program.</p>	<input type="text" value="Public Health Service Act, section 301, 'Research and Investigation,' (42 U.S.C. 241); sections 304, 306 and 308(d); (42 U.S.C. 242 b, k, and m(d))."/>																												
<p>22 Are records on the system retrieved by one or more PII data elements?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>																												

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	The contractor will house PII in a separate database as the survey responses and only certain staff know will have access to the PII data.	
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.	Individuals will be notified through a consent form that will appear as the first page of the web survey. Only those who consent to participate will have information collected.	
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.	An individual does not have to complete the survey. The consent form will let the potential respondent know what kind of data is being collected and they have the option to decline participation.	
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.	If a potential respondent clicks on an advertisement for our study from a social media website or search engine, they will be taken to a landing page for the study. This landing page contains a consent form that explains our study, the kind of information being collection, and their rights as a research participant. The individual then has to click to consent to continue to one of the study surveys. If they do not consent, they will not be able to participate in the study and no data will be collected on them.	
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.	All participants who consent to participation will be given two toll-free phone numbers. The first toll-free number will be provided by the contractor and should be used by participants for assistance with technical issues associated with the web survey or receiving the study incentive. The second toll-free number, will connect participants with the study Principal Investigator (Juan Rodriguez) in the Division of Cancer Prevention and Control at CDC. This number should be used for questions or comments associated with the survey content, or questions and concerns about consent. Concerns about accuracy of PII will be handled by the tell-free number provided by the contractor. Concerns about inappropriate use or disclosure of PII will be handled by the PI at CDC.	
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.	There is no process because this is a one-time data collection and PII will be destroyed after being used to deliver incentives and verify no surveys were duplicative.	
31 Identify who will have access to the PII in the system and the reason why they require access.	<input type="checkbox"/> Users <input type="checkbox"/> Administrators <input type="checkbox"/> Developers <input checked="" type="checkbox"/> Contractors <input type="checkbox"/> Others	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> The contractor will be responsible for delivering incentives and verifying <input type="text"/>

<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>CDC's contractor implements access on the least privilege method. Only people whose jobs require access to the data are granted the appropriate level of access.</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>Staff with access to PII was limited to only study team members and the data files with PII are being saved in secure locations. Only the sampling statistician who is designing survey weights will have access to geographical information. They will not have the ability to link the PII with survey responses to protect identities. IP addresses will only be accessible by those who are ensuring fraudulent data entry. Name, address, and e-mail address will only be accessible by staff who are mailing incentives or sending out reminders about survey participation.</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 contractor employees are required to take Privacy Awareness and IT Security Awareness training, as well as Ethics and Compliance training.</p>	
<p>35 Describe training system users receive (above and beyond general security and privacy awareness training).</p>	<p>N/A</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>Participant e-mail addresses, and IP addresses will be deleted by the contractor at the end of the data collection period. Respondent names and mailing addresses will be deleted once all survey incentives have been mailed. Respondent zip code will be used to create statistical weights and will be deleted once the weight variable is finalized. All PII will be deleted before data delivery to CDC. CDC will not receive PII.</p>	
<p>38 Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.</p>	<p>The PII will be kept in a separate system with limited access.</p> <p>Administrative: Personnel Screening, audits, access agreements, sanctions, Risk Assessment, Planning, System and Services acquisition, security assessments</p> <p>Technical: Identification and Authentication – use of Active Directory groups, Access Control processes utilizing Active Directory for permissions\electronic signature, Least privilege access, encryption, Audit and accountability, System and Communication</p> <p>Physical: Personnel Security (Guards, key cards, locked Data Center, Cameras), Physical and Environmental Protection (Fire\Water\Uninterruptable Power Supply (UPS), Contingency Plan, Configuration Management –use of baselines (Center for Internet Security (CIS) settings\Federal Desktop Core Configuration (FDCC), Maintenance – vulnerability scanning \remediation, Media Protection – encrypted tapes, Awareness and Training of staff</p>	
<p>39 Identify the publicly-available URL:</p>	<p><a href="http://www.voxco.com/">http://www.voxco.com/</a> will be used for the online surveys.</p>	

40	Does the website have a posted privacy notice?	<input type="radio"/> Yes <input checked="" 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?	<input type="radio"/> Yes <input checked="" type="radio"/> No
43	Does the website contain links to non- federal government websites external to HHS?	<input checked="" type="radio"/> Yes <input type="radio"/> No
43a	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	<input checked="" type="radio"/> Yes <input type="radio"/> No

**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"/>	
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"/>	
5	Is this a candidate for PII minimization?	<input type="radio"/> Yes <input type="radio"/> No
<i>Reviewer Notes</i>	<input type="text"/>	
6	Does the PIA accurately identify data retention procedures and records retention schedules?	<input type="radio"/> Yes <input type="radio"/> No
<i>Reviewer Notes</i>	<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 Questions		Answer	
<i>Reviewer Notes</i>	<input type="text"/>		
8	Does the PIA raise any concerns about the security of the PII?	<input type="radio"/> Yes <input type="radio"/> No	
<i>Reviewer Notes</i>	<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	
<i>Reviewer Notes</i>	<input type="text"/>		
10	Is the PII appropriately limited for use internally and with third parties?	<input type="radio"/> Yes <input type="radio"/> No	
<i>Reviewer Notes</i>	<input type="text"/>		
11	Does the PIA demonstrate compliance with all Web privacy requirements?	<input type="radio"/> Yes <input type="radio"/> No	
<i>Reviewer Notes</i>	<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	
<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"/>