# Privacy Impact Assessment Form

v 1.21

| Status | | Form Number | | Form Date | 10/11/18 |
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| | Question | Answer |
|---|---|---|
| 1 | OPDIV: | CDC |
| 2 | PIA Unique Identifier: | 0923-18AJA |
| 2a | Name: | Environmental Health and Land Reuse Certification |
| 3 | The subject of this PIA is which of the following? | ◯ General Support System (GSS)<br>◯ Major Application<br>◯ Minor Application (stand-alone)<br>◯ Minor Application (child)<br>◉ Electronic Information Collection<br>◯ Unknown |
| 3a | Identify the Enterprise Performance Lifecycle Phase of the system. | Implementation |
| 3b | Is this a FISMA-Reportable system? | ◯ Yes<br>◉ No |
| 4 | Does the system include a Website or online application available to and for the use of the general public? | ◯ Yes<br>◉ No |
| 5 | Identify the operator. | ◉ Agency<br>◯ Contractor |
| 6 | Point of Contact (POC): | POC Title: Environmental Health Scientist<br>POC Name: Laurel Berman<br>POC Organization: CDC/NCEH/ATSDR<br>POC Email: fjq0@cdc.gov<br>POC Phone: 312-886-7476 |
| 7 | Is this a new or existing system? | ◉ New<br>◯ Existing |
| 8 | Does the system have Security Authorization (SA)? | ◯ Yes<br>◉ No |
| 8b | Planned Date of Security Authorization | ☒ Not Applicable |

| 8c | Briefly explain why security authorization is not required | Two authorized CDC systems will be used for this electronic data collection: Training and Continuing Education Online (TCEO) for registration info and testing and Anonymous Instance - Research Electronic Data Capture (REDCap) for a course follow-up survey. | |
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| 10 | Describe in further detail any changes to the system that have occurred since the last PIA. | Not applicable - new ICR and new PIA | |
| 11 | Describe the purpose of the system. | The goal of the information collection is to collect participant feedback on the environmental health land reuse certificate course content developed by ATSDR and its collaborator.<br><br>This ICR does not involve creation of a  new IT system by ATSDR. ATSDR intends to host an Environmental Health and Land Reuse course using the Centers for Disease Control and Prevention's (CDC) system Training and Continuing Education Online (TCEO).  TCEO will offer continuing education credits for the 5-part training. TCEO is an authorized CDC information system.  It was authorized to operate on 5/16/2018 and has PRA clearance # 0920-0017; 5/15/2019.  Its approved Privacy Impact Assessment authorizes it to store, process, and transmit Personally Identifiable Information (PII).  The TCEO registration system will collect information in identifying form (IIF) such as name, address, email, phone number and zip code to complete participant registration and course content engagement, such as to receive continuing education credits or a course completion certificate. ATSDR will ask the National Environmental Health Association (NEHA) as well as other partners (e.g. tribal entities) to provide participant names and emails for users who have taken the training in order to conduct a one time follow up survey.  To protect the personally identifiable information of the participants, ATSDR's Land Reuse Team will store information in a secure fileshare. This system will be used to store participant email information in a secure computer system drive with protected access. The team lead will contact individual participants with a link to a secure survey.  The survey will use the CDC authorized system Anonymous Instance - Research Electronic Data Capture (REDCap).  REDCap was authorized to operate on 10/18/2017. REDCap is a secure web application for building and managing online surveys and databases. REDCap will be used to manage and store the follow up feedback data.   Anonymous survey data from REDCap will be downloaded and securely stored on a file-share.  Information collected and stored will be removed by the Land Reuse Team from the secure drive after three years. | |
| 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.) | Data collection will be conducted through support of two systems,  TCEO and REDCap. TCEO system will collect registration data for participants.<br><br>REDCap will capture feedback data on participants. The participant evaluation feedback will occur one time through an anonymous survey, post-training certification. | |

| 13 | Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily. | This ICR will use two systems for its data needs: TCEO will be used to collect participant registration data and REDCap to obtain feedback data.<br><br>TCEO system uses the HTTPS protocol on a CDC web server that uses encryption to protect the information participants provide. Information in an individual's TCEO account is accessible to that individual and CDC for reporting purposes and to provide assistance. Some account information is accessible by the TCEO Learner Support Team to help participants access their accounts or use the system. For reporting purposes, TCEO data is shared with accrediting organizations as required and course data (information about the group of people who took a course) may be summarized and shared with course providers for evaluation and program improvement purposes. TCEO asks participants to create a password for registration. TCEO collects participants' email, name, address, city, country, postal code, daytime telephone number, and job-related information (employer, education, work setting, primary profession).<br><br>REDCap will be used for collecting participant feedback, this electronic survey will be completed one time, six to 12 months post-certification. The feedback questions are designed to take up to 20 minutes to complete. The majority of the questions are selection (e.g. select one or all that apply) with fill-in options, e.g., "other". The feedback survey will assess participant's increased awareness, skills, and knowledge in environmental health and land reuse. | |

| 14 | Does the system collect, maintain, use or share **PII**? | ⦿ Yes<br>◯ No |

| 15 | Indicate the type of PII that the system will collect or maintain. | |

| ☐ Social Security Number | ☐ Date of Birth |
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| ☒ Name | ☐ Photographic Identifiers |
| ☐ Driver's License Number | ☐ Biometric Identifiers |
| ☐ Mother's Maiden Name | ☐ Vehicle Identifiers |
| ☒ E-Mail Address | ☒ Mailing Address |
| ☒ Phone Numbers | ☐ Medical Records Number |
| ☐ Medical Notes | ☐ Financial Account Info |
| ☐ Certificates | ☐ Legal Documents |
| ☐ Education Records | ☐ Device Identifiers |
| ☐ Military Status | ☐ Employment Status |
| ☐ Foreign Activities | ☐ Passport Number |
| ☐ Taxpayer ID | |
| Job Category | |
| Job Title | |

| 16 | Indicate the categories of individuals about whom PII is collected, maintained or shared. | ☐ Employees<br>☒ Public Citizens<br>☐ Business Partners/Contacts (Federal, state, local agencies)<br>☐ Vendors/Suppliers/Contractors<br>☐ Patients<br>Other Environmental Professionals who are citizens and typically employed or are adult students |
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| 17 | How many individuals' PII is in the system? | 500-4,999 |
| 18 | For what primary purpose is the PII used? | Online registration for trainings and notification of new trainings |
| 19 | Describe the secondary uses for which the PII will be used (e.g. testing, training or research) | One-time participant follow up to determine effectiveness of training, which may be used for evaluation or publications. Email addresses will be provided by NEHA or known cohorts (e.g. tribal entities, state cooperative agreement partners or graduate students) for this follow-up. |
| 20 | Describe the function of the SSN. | N/A |
| 20a | Cite the **legal authority** to use the SSN. | N/A |
| 21 | Identify **legal authorities** governing information use and disclosure specific to the system and program. | The legal authorities are the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), the 1984 amendments to the Resource Conservation and Recovery Act of 1976 (RCRA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA). |
| 22 | Are records on the system retrieved by one or more PII data elements? | ○ Yes<br>◉ 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: _____<br>Published: _____<br>Published: _____<br>☐ In Progress |

| 23 | Identify the sources of PII in the system. | Directly from an individual about whom the information pertains |
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Directly from an individual about whom the information pertains

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| ☐ | 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. | OMB Control No. 0923-NEW |
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| 24 | Is the PII shared with other organizations? | ○ Yes ◉ No |
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| 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 |
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| 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)). | |
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| 24c | Describe the procedures for accounting for disclosures | |
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| 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 as to what PII is being collected from them and how the information will be used or shared when they first log into the system as applicants or alumni and will be available for their review every time they log in thereafter, and alumni will provide electronic consent before they can enter their data.<br><br>Otherwise, CDC requires the governmental or non-governmental source contributing the information to have obtained the participant's consent with the research or public health event by capturing a certified electronic signature from each participant in the research protocol or study beforehand. | |
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| 26 | Is the submission of PII by individuals voluntary or mandatory? | ⦿ Voluntary<br>◯ 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 can't opt-out of collection or use of their PII other than not participating in the training. The survey doesn't collect PII. | |
| 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. | Should major changes ever occur to the system, CDC/CSELS/ DSEPD administrators will notify individuals whose PII is in the system by email asking them to provide consent as appropriate by either written or electronic notice.<br><br>Otherwise, CDC requires the entity contributing the information to obtain participant consent with the research or public health event by capturing a certified electronic signature for each participant in the research protocol or study providing their PII. As part of the official record, each project's program/principal investigator (PI) is responsible for implementing processes to ensure records belonging to the individual participants are maintained, transferred and destroyed according to either the general or project specific record retention requirements. If major changes to the disclosure and/or data uses of PII occur during this retention period, this consent document will be used to notify and update the consenting individuals.<br><br>As the CDC owner of the PII collected, each PI is responsible for both identifying major PII data use and disclosure changes and ensuring that the consenting individual is properly notified. The PI acknowledges this responsibility through the completion and acceptance of the project request form. | |

| 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 process of handling a user's concern with PII of the system would be to contact the email address listed on the webpage. The system administrator would then be responsible for resolving the issue.<br><br>Otherise, individuals with concerns that their PII is inaccurate or may have been inappropriately obtained, used, or disclosed should first contact the contributing entity governmental or non-governmental organization to which they initially disclosed the information. If unsatisfied with that collecting organization's response, the individual can contact CDC directly for assistance identifying the appropriate principal investigator (PI); as the CDC owner of the PII collected, each PI is responsible for working with individuals to resolve these types of concerns. The PI acknowledges this responsibility through the completion and acceptance of the project request form. | |
| :--- | :--- | :--- | :--- |
| 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. | Data is maintained by the end user.<br><br>Otherwise, each individual project's program/PI is responsible for periodic reviews of the integrity, availability, accuracy, and relevancy of PII collected. The PI is notified of and acknowledges these responsibilities through the completion and acceptance of the project request form. | |
| 31 | Identify who will have access to the PII in the system and the reason why they require access. | ☐ Users<br><br>☒ Administrators    TCEO staff to issue continuing education credits, credit for contract<br><br>☐ Developers<br><br>☐ Contractors<br><br>☐ Others | |
| 32 | Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII. | A formal request must be sent to them approved by the Business Steward prior to access being granted. Users can only access their own profile. Administration privileges are only granted to the staff of the Continuing Education group.<br><br>Otherwise, role-based access controls are used to determine which system users may access PII. | |
| 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. | The application utilizes the principle of least privilege access; the least privilege model is used to allow those with access to PII to only access the minimum amount of information necessary to perform their job. | |
| 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 CDC users are required to take Security and Privacy Awareness Training at least annually. | |

| 35 | Describe training system users receive (above and beyond general security and privacy awareness training). | None |
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| 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. | Records are maintained in agency for two years. 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 destroyed by paper recycling process after 12 years, unless needed for further study. |
| 38 | Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls. | Administrative, technical, and physical controls are in place to protect PII contained in the TCEO and RedCap systems. Participant emails for courses will be protected by various controls.<br><br>Administrative -  Principal investigator limits access to the network share to only authorized individuals working on the study and specifically the follow-up survey.  Access is reviewed when users leave the project, ATSDR, or CDC.<br><br>Technical -  The PII is secured using the CDC/IS Active Directory authentication and share access controls.  All data is processed on CDC encrypted laptops.  Data is monitored by Network and IT security controls which are administered by OCISO and ITSO.<br><br>Physical -  Guards, ID badges and key card restrictions restrict access to buildings and rooms that have computers and servers containing the collected information. |

**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? | ○ Yes ○ No |
| *Reviewer Notes* | | |
| 2 | Does the PIA appropriately communicate the purpose of PII in the system and is the purpose justified by appropriate legal authorities? | ○ Yes ○ No |
| *Reviewer Notes* | | |
| 3 | Do system owners demonstrate appropriate understanding of the impact of the PII in the system and provide sufficient oversight to employees and contractors? | ○ Yes ○ No |
| *Reviewer Notes* | | |
| 4 | Does the PIA appropriately describe the PII quality and integrity of the data? | ○ Yes ○ No |

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|---|---|---|
| *Reviewer Notes* | | |
| 5 | Is this a candidate for PII minimization? | ○ Yes<br>○ No |
| *Reviewer Notes* | | |
| 6 | Does the PIA accurately identify data retention procedures and records retention schedules? | ○ Yes<br>○ No |
| *Reviewer Notes* | | |
| 7 | Are the individuals whose PII is in the system provided appropriate participation? | ○ Yes<br>○ No |
| *Reviewer Notes* | | |
| 8 | Does the PIA raise any concerns about the security of the PII? | ○ Yes<br>○ No |
| *Reviewer Notes* | | |
| 9 | Is applicability of the Privacy Act captured correctly and is a SORN published or does it need to be? | ○ Yes<br>○ No |
| *Reviewer Notes* | | |
| 10 | Is the PII appropriately limited for use internally and with third parties? | ○ Yes<br>○ No |
| *Reviewer Notes* | | |
| 11 | Does the PIA demonstrate compliance with all Web privacy requirements? | ○ Yes<br>○ No |
| *Reviewer Notes* | | |
| 12 | Were any changes made to the system because of the completion of this PIA? | ○ Yes<br>○ No |
| *Reviewer Notes* | | |

| General Comments | |
|---|---|
| OPDIV Senior Official for Privacy Signature | HHS Senior Agency Official for Privacy |