

# 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

|   |  |  |
|---|--|--|
| <p>11 Describe the purpose of the system.</p>   | <p>Rocky Mountain Spotted Fever is a life-threatening and rapidly progressive tick-borne disease. Infection begins with non-specific symptoms like fever, headache, and muscle pain, but unmitigated damage to the vascular endothelium quickly results in organ failure, necrosis, and ultimately death. The purpose of this study is to help identify long term disability related to RMSF illness. The information obtained from this study will help inform providers as they treat and manage patients with RMSF. It will also help inform time to recovery and expected disability outcomes. This system, RMSF-LTS, will serve as a repository for data obtained from this study.</p>  |  |
| <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> | <p>Patients will be asked a series of screening questions to determine if they have had any ongoing or residual effects from their acute illness with RMSF. If they report any ongoing symptoms or deficits they will be asked to participate in a full neurological assessment. Results of the assessment will be collected and stored.</p> <p>The medical chart abstraction portion of the study will collect information on name, age at illness, date of birth, address, phone number, sex, symptoms, date of illness onset, diagnostic and treatment information. For hospitalized patients, additional information on procedures performed and course will be obtained.</p> <p>The PII collected will be kept in Paper form only and will not be entered into this electronic system. User access is validated by CDC Active Directory and no user credentials are collected by this system. AD is a separate system with its own PIA.</p>   |  |
| <p>13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.</p>  | <p>Long term sequela of Rocky Mountain spotted fever (RMSF-LTS) will collect the following data on paper forms: Neurological assessment results, name, age at illness, date of birth, address, phone number, sex, symptoms, date of illness onset, diagnostic and treatment information. For hospitalized patients, additional information on procedures performed and course will be obtained. PII collected will be retained in paper form only and will not be entered into this electronic system; however, the CDC Rickettsial Zoonoses Branch (RZB) staff will enter the non-PII data into this system.</p> <p>Data will be analyzed by RZB epidemiologists and they will act as the owners and stewards of the data. The data collected for this study will be used to help identify long term disability related to RMSF illness. The information obtained from this study will help inform providers as they treat and manage patients with RMSF.</p> <p>User access to the system is validated by CDC Active Directory and no user credentials are collected by this system. AD is a separate system with its own PIA.</p> |  |
| <p>14 Does the system collect, maintain, use or share PII?</p>  | <p><input checked="" type="radio"/> Yes<br/><input type="radio"/> No</p>   |  |

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 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 type="checkbox"/> E-Mail Address           | <input checked="" type="checkbox"/> Mailing Address |
| <input checked="" type="checkbox"/> Phone Numbers | <input type="checkbox"/> Medical Records Number     |
| <input checked="" 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              |   |

sex  
age

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

|  |
|--|
| <input type="checkbox"/> Employees   |
| <input type="checkbox"/> Public Citizens   |
| <input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies) |
| <input type="checkbox"/> Vendors/Suppliers/Contractors                               |
| <input checked="" 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.

0920-1011 Exp. 01/31/2020

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.

State surveillance data is first screened for individuals who tested positive for RMSF during the study period to determine eligibility. Eligible individuals are then contacted by phone or in-person and are provided with an IRB-approved informed consent form. Parents of children under the age of 8 years will be asked to respond to the questionnaire on behalf of their child. .

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.

Individuals may choose not to answer questions or provide their Personally Identifiable Information (PII) at any time during the questionnaire process.

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.

There is no process in place because this is a one time data collection and consent was obtained at the beginning of the data collection. It is not anticipated that there will be major changes made to the system; therefore there would be no reason to obtain consent a second time.

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 consent form has the contact information of the principal investigator. Any concerns can be reported to that individual.

|  |   |  |
|--|---|--|
| <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>PII is held in paper form only. It is manually inventoried annually by principal investigators for integrity, availability, accuracy, relevancy by comparing the PII collection and destruction records and associated questionnaires to ensure all originally collected PII information is accounted for.</p>   |  |
| <p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>   | <p><input checked="" type="checkbox"/> Users</p>  | <p>Users, who are Principal Investigators, and will conduct interviews and collect data.</p> |
|  | <p><input type="checkbox"/> Administrators</p>  |  |
|  | <p><input type="checkbox"/> Developers</p>  |  |
|  | <p><input type="checkbox"/> Contractors</p>   |  |
|  | <p><input type="checkbox"/> Others</p>  |  |
| <p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>   | <p>The RZB program selects the individuals who will be the principal investigators for this study. Their selection is based on their training and knowledge of the subject matter. The PII is collected during the course of the completion of questionnaires for eligible individuals. The principal investigators are the only users with access to the PII which is only held in paper form and not entered into the electronic system. Administrators, developers, and contractors will not have access to the PII because it is not part of the electronic system.</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>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>Users are required to complete CDC's Annual Security and Privacy Awareness Training to make them aware of their responsibilities for protecting the information being collected and maintained.</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 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<br/><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>Data is held for 10 years in accordance with the CDC General Records Schedule (GRS) 20.6, maintain for 10 years after system retirement.</p>   |  |

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

PII is held in paper form only and locked in a cabinet, in a locked room, in a locked building, and protected by armed security guards.

Additionally, all personnel are required to undergo Privacy Awareness Training at least annually.

General Comments

OPDIV Senior Official for Privacy Signature