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Privacy Impact Assessment Form

v 1.21

Status		Form Number	0920-19AUK	Form Date	11/21/2019

	Question	Answer
1	OPDIV:	CDC
2	PIA Unique Identifier:	0920-19AUK
2a	Name:	Promoting Adolescent Health through School-Based HIV Preven
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: Health Scientist POC Name: Diane Orenstein POC Organization: CDC, NCHHSTP, DASH POC Email: dro1@cdc.gov POC Phone: 770.488.8003
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

8c	Briefly explain why security authorization is not required	Because this not a system.	
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.	In September 2018, the Division of Adolescent and School Health (DASH) funded 25 Local Education Agencies (LEAs) under Promoting Adolescent Health through School-Based HIV Prevention (PS18-1807). PS18-1807 supports a multi-component, multi-level effort to support youth reaching adulthood in the healthiest possible way. DASH is developing the Program Evaluation and Reporting System (PERS), a program evaluation and monitoring system for LEAs to report process and outcome measures. PERS will collect data about LEAs and their priority schools related to three strategies, Sexual Health Education (SHE), Sexual Health Services (SHS), and Safe and Supportive Environments (SSE).	
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.)	LEAs will enter process and outcome data into the PERS system semi-annually, using a set of three questionnaires. The questionnaires ask for programmatic information about the LEAs and their priority schools. Data collection involves collecting programmatic reporting data from the project manager at each of the funded NOFO 1807 Local Education Agencies (LEAs). LEAs are the school districts funded to implement this programmatic initiative.

The data that is collected from the program managers does not involve the collection of sensitive, or personal information. Although the name and work email address of the program managers at each LEA entering, viewing, and submitting data stored for each responding organization, the system only collects programmatic data about LEAs and priority schools.

CDC will maintain information in secure electronic files that will only be accessible to authorized members of the team. Electronic files will be stored on secure network servers, and access will be restricted to approved team members identified by user ID and password. | |

13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	Data entry into PERS is structured as a series of questionnaires which are answered by each LEA for their own work and the work of their priority schools. In addition, LEAs can upload relevant curriculum documents into the system. LEAs will have the option for multiple staff members have log-ins. To facilitate the data collection process for LEAs, copies of the questionnaires in PDF format are available for download from PERS. The data that is collected from the program managers does not involve the collection of sensitive, or personal information. Although the name and work email address of the program managers at each LEA entering, viewing, and submitting data stored for each responding organization, the system only collects programmatic data about LEAs and priority schools. CDC will maintain information in secure electronic files that will only be accessible to authorized members of the team. Electronic files will be stored on secure network servers, and access will be restricted to approved team members identified by user ID and password.
14	Does the system collect, maintain, use or share **PII**?	◉ Yes ○ No

15	Indicate the type of PII that the system will collect or maintain.	☐ Social Security Number	☐ Date of Birth
		☒ 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	Other…
		Business E-Mail Address	Other…
		Other…	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?	100-499

18	For what primary purpose is the PII used?	Names and email addresses are used to link PERS users to their LEA and to determine which forms they have access to in the system. Professional Email addresses are used as the user log-in.
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	none
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.	Sections 301(a) and 317(k)(2) of the Public Health Service Act [42 U.S.C. Sections 241 and 247(k)(2)], as amended

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: 09-90-1901 HHS Correspondence, Customer Serv 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)).	DASH website includes the names of the following: all our funded LEAs from PS18-NOFO1807 and all project managers for each LEA. Anyone can google "local education agencies within a specified state" and all of the school districts will appear. Any person can then see all of the departments within the specific LEA, e.g. school instruction & curricula, funded projects, etc. Once a department or program is opened, a person can then go to "directory" and see a list of names and emails for all persons on staff.
24c	Describe the procedures for accounting for disclosures	N/A
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 are asked to register in the system using their name, professional email address, and LEA name.
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 can opt-out of providing their name or email address, however, they will not be able to access the system. The system must be able to identify the user via email address and the user must be linked to their LEA for data collection and analysis.
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.	In the event that a major change occurs, individuals will be notified via email.
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.	No process exists as we will only collecting individuals names and their professional email address.
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.	The contract will review the list of registered users at various points in the project to ensure that only active users' PII is stored in the system.

31	Identify who will have access to the PII in the system and the reason why they require access.	☐ Users	
		☒ Administrators	System maintenance
		☒ Developers	System development and ~~maintenance~~
		☒ Contractors	Direct Contractor need access for ~~system maintenance and data analysis~~
		☐ Others	
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Administrators, developers, and contractors that are responsible for maintaining and developing the system and conducting data analysis will have a "Systems/Database Administrator" user-type which will allow them to access the User Names and Email addresses. Other PERS users will only have access to their own user name, email, and data.	
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.	Those with access to PII need to be able to confirm the users' names, email addresses, and corresponding funded agency.	
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 employees and contractors must complete the Records Management and Security Awareness training. In addition, IT Administrators must take the Information Security for IT Administrators course.	
35	Describe training system users receive (above and beyond general security and privacy awareness training).	none	
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 retained and disposed of in accordance with the CDC Records Control Schedule 04-4-22 Family of HIV Surveys, Division of HIV/AIDS Prevention/Surveillance and Epidemiology.	
38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	Administrative controls: The information collection involves use of web-based data collection methods. The website does use cookies, and access to the web-based questionnaire, which is password-protected and given only to the staff of the CDC/DASH-funded LEAs who will complete the questionnaires. Once the contractor is notified that business partners no longer are participating, an Administrator will delete the individuals' contact information from the list of users. Technical controls: CDC will maintain information in secure electronic files that will only be accessible to authorized members of the team. Electronic files will be stored on secure network servers, and access will be restricted to approved team members identified by user ID and password. Physical controls include security guards, identification badges, key cards, and closed circuit TV.	

Reviewer Questions	Answer
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
Reviewer Notes		
5	Is this a candidate for PII minimization?	○ Yes ○ No
Reviewer Notes		
6	Does the PIA accurately identify data retention procedures and records retention schedules?	○ Yes ○ No
Reviewer Notes		
7	Are the individuals whose PII is in the system provided appropriate participation?	○ Yes ○ No
Reviewer Notes		
8	Does the PIA raise any concerns about the security of the PII?	○ Yes ○ No
Reviewer Notes		
9	Is applicability of the Privacy Act captured correctly and is a SORN published or does it need to be?	○ Yes ○ No
Reviewer Notes		
10	Is the PII appropriately limited for use internally and with third parties?	○ Yes ○ No

Reviewer Questions	Answer
Reviewer Notes	
11 Does the PIA demonstrate compliance with all Web privacy requirements?	○ Yes ○ No
Reviewer Notes	
12 Were any changes made to the system because of the completion of this PIA?	○ Yes ○ No
Reviewer Notes	

General Comments	

OPDIV Senior Official for Privacy Signature		HHS Senior Agency Official for Privacy	