

Privacy Impact Assessment Form

v 1.47.2

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

9 Indicate the following reason(s) for updating this PIA. Choose from the following options.

<input checked="" type="checkbox"/> PIA Validation (PIA Refresh/Annual Review)	<input type="checkbox"/> Significant System Management Change
<input type="checkbox"/> Anonymous to Non-Anonymous	<input type="checkbox"/> Alteration in Character of Data
<input type="checkbox"/> New Public Access	<input type="checkbox"/> New Interagency Uses
<input type="checkbox"/> Internal Flow or Collection	<input type="checkbox"/> Conversion
<input type="checkbox"/> Commercial Sources	

10 Describe in further detail any changes to the system that have occurred since the last PIA.

11 Describe the purpose of the system.

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.)

13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

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.

<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 checked="" 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 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	

16	Indicate the categories of individuals about whom PII is collected, maintained or shared. <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" value="No"/>
17	How many individuals' PII is in the system? <input type="text" value="100,000-999,999"/>
18	For what primary purpose is the PII used? <input type="text" value="PII is gathered for the purpose of making contact with mothers having a recent live birth."/>
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research) <input type="text" value="Research"/>
20	Describe the function of the SSN. <input type="text" value="N/A"/>
20a	Cite the legal authority to use the SSN. <input type="text" value="N/A"/>
21	Identify legal authorities governing information use and disclosure specific to the system and program. <input type="text" value="N/A"/>
22	Are records on the system retrieved by one or more PII data elements? <input checked="" type="radio"/> Yes <input type="radio"/> 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: <input type="text" value="09-20-0160"/> Published: <input type="text"/> Published: <input type="text"/> <input type="checkbox"/> 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.

N/A, not required

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

Purpose for contacting respondents to complete PRAMS survey.

- 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)).

The PRAMS Program has Data Sharing Agreement with all 40 states plus NY City for survey data collection activities.

24c Describe the procedures for accounting for disclosures

Data is tracked via email logs and spreadsheets

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.

Respondents for PRAMS surveillance are mothers having a recent live birth. They are contacted by PRAMS states before the mail survey is sent to them and notified by a pre-letter.

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.	All of the PRAMS surveillance is conducted by PRAMS states, and they receive information from their vital records regarding the mothers to be surveyed. Respondents participation is voluntary basis.										
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.	Any major changes to the software system will not impact encrypted PII information in the database. Hence, the consent that the respondent provides while completing mail or phone survey is still valid. PII data is not used beyond data collection efforts made to contact the individual.										
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.	A resource list is distributed with study materials which has contact information for the respective state or local partner. Complaints should be addressed to the appropriate resource at the state or local partner level and then communicated through appropriate channels to 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.	PII data is not used beyond data collection efforts made to contact the individual. A batch is imported in PIDS every month containing information to contact the respondent via mail or phone mode. The batch normally stays open for 90 days, until when the state contacts the respondent to collect information for the PRAMS survey. Once the batch is closed, states do not make further efforts to contact the respondents, and the PII data is not used after that.										
31	Identify who will have access to the PII in the system and the reason why they require access.	<table border="1"> <tr> <td><input type="checkbox"/> Users</td> <td></td> </tr> <tr> <td><input checked="" type="checkbox"/> Administrators</td> <td>Review</td> </tr> <tr> <td><input type="checkbox"/> Developers</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Contractors</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Others</td> <td></td> </tr> </table>	<input type="checkbox"/> Users		<input checked="" type="checkbox"/> Administrators	Review	<input type="checkbox"/> Developers		<input type="checkbox"/> Contractors		<input type="checkbox"/> Others	
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32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Role based Access Control (RBAC) is utilized										
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 Least privilege model is utilized										
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.	Annual Security and Privacy Awareness Training										
35	Describe training system users receive (above and beyond general security and privacy awareness training).	All system users are either state employees or contractors, hence they have to comply with their state's security, privacy awareness and any other training required by the state.										

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. Records are maintained in agency for two years. Source documents for computer disposed of when no longer needed by program officials. Personal identifiers may be deleted from records when no longer needed in the study as determined by the system manager, and as provided in the signed consent form, as appropriate. 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 when 20 years old, 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.

PII data is encrypted and stored in the database at CDC, and complies with all security measures. Potentially, a CDC database administrator can access the PII data, if they have the decryption routine. In our case, the solution provider has implemented the encryption/decryption process, and they are not the database administrator. The system is in a protected data center with guards at the entry point to the facility.

General Comments

OPDIV Senior Official for Privacy Signature

HHS Senior Agency Official for Privacy