

# Privacy Impact Assessment Form

v 1.21

Status  Form Number  Form Date

Question

Answer

1 OPDIV:

CDC

2 PIA Unique Identifier:

TBD

2a Name:

ATSDR Communication Activities Survey (ACAS)

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.

Development

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

8c	Briefly explain why security authorization is not required	This study uses multiple CDC authorized systems for data collection, processing, and storage.	
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.	The purpose of the study is to gather information from communities in proximity to hazardous waste so that ATSDR can effectively implement programs that address the communities' concerns.	
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 study will collect, maintain, or share the following types of information:</p> <p>Contact (email address, phone number)  Demographic (whether community member or agency stakeholder)  Surveys (customer satisfaction)</p> <p>CDC users will authenticate using Active Directory, a CDC authorized system. No other users will be authenticated.</p>	
13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	<p>Communities in proximity to hazardous waste sites are concerned that they are being exposed to hazardous substances being released into the environment. This study will conduct surveys that help ATSDR to better address community concerns.</p> <p>Contact information such as email address and telephone numbers will be used to send online or telephone surveys to members of the community who indicated they would like to take part in providing customer feedback.</p> <p>Demographic information will be used to distinguish responses from two types of customers (community or state/local agency)</p> <p>Survey responses will be used to assess the effectiveness of ATSDR's communication methods with the public and to make improvements in customer service.</p> <p>ATSDR will not share the contact information. ATSDR will delete the email address from the database as soon as the online response to the ACAS is received. ATSDR will not store telephone numbers during the SMS Text Survey polling.</p> <p>Deidentified survey results will be shared internally with ATSDR leadership and staff across the agency and disseminated externally to stakeholders and partners through annual reports and budget performance narratives that will be posted via the internet.</p> <p>The data will be stratified by demographic categories (community member or agency stakeholder) so that ATSDR can improve and provide customer-specific communications.</p> <p>CDC users will authenticate using Active Directory, a CDC authorized system. No other users will be authenticated.</p>	

14 Does the system collect, maintain, use or share PII?	<input checked="" type="radio"/> Yes <input type="radio"/> No																												
15 Indicate the type of PII that the system will collect or maintain.	<table border="0"> <tr> <td><input type="checkbox"/> Social Security Number</td> <td><input type="checkbox"/> Date of Birth</td> </tr> <tr> <td><input 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 checked="" 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="Other..."/></td> </tr> <tr> <td><input type="text" value="Demographic"/></td> <td><input type="text" value="Other..."/></td> </tr> <tr> <td><input type="text" value="Other..."/></td> <td><input type="text" value="Other..."/></td> </tr> </table>	<input type="checkbox"/> Social Security Number	<input type="checkbox"/> Date of Birth	<input 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 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	<input type="text" value="Other..."/>	<input type="text" value="Demographic"/>	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>
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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 checked="" type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies) <input type="checkbox"/> Vendors/Suppliers/Contractors <input type="checkbox"/> Patients Other <input type="text"/>																												
17 How many individuals' PII is in the system?	<input type="text" value="500-4,999"/>																												
18 For what primary purpose is the PII used?	<input type="text" value="The primary purpose of the PII is for sending participants a link to the customer service survey(s)."/>																												
19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	<input type="text" value="There is no secondary purpose for the PII in the system."/>																												
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 "superfund="" 'resource="" (42="" 1976"="" 1984="" 1986"="" 6901)."="" 9601,="" 9604);="" act="" amended="" amendments="" and="" as="" by="" conservation="" in="" of="" reauthorization="" recovery="" the="" type="text" u.s.c.="" value="Comprehensive Environmental Response, Compensation, and Liability Act of 1980"/>																												
22 Are records on the system retrieved by one or more PII data elements?	<input type="radio"/> Yes <input checked="" 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:

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.

OMB Control No. 0923-0055; exp. date 06/30/2020; we are submitting a reinstatement ICR to OMB to reactivate this number.

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)).

There are no agreements in place that authorize the information sharing or disclosure.

24c Describe the procedures for accounting for disclosures

It is not envisioned that disclosures will be necessary. However, if a disclosure is needed, they will be accounted for in a spreadsheet that is maintained by the study point of contact.

<p>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.</p>	<p>The sign in sheet at community meetings informs the participants that PII is being collected and what their personal information will be used for.</p>
<p>26 Is the submission of PII by individuals voluntary or mandatory?</p>	<p><input checked="" type="radio"/> Voluntary <input type="radio"/> Mandatory</p>
<p>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.</p>	<p>Individuals may opt out of the collection or use of their PII by not completing a survey and/or by not providing contact information at the community meetings.</p>
<p>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.</p>	<p>ATSDR will delete the email address from the database as soon as the online response to the ACAS is received. ATSDR utilize but will not collect or store telephone numbers during the SMS Text Survey polling. No further contact with meeting attendees will be possible that this point.</p>
<p>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.</p>	<p>Individuals, who believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate, should contact the point of contact (POC) as identified in the sign-in sheet. They will be directed to identify the record and specify the information being contested, the corrective action sought, and the reasons for requesting the correction, along with supporting information to show how the record is inaccurate, incomplete, untimely, or irrelevant. The POC will make a determination as to the next steps that should be taken to address the individual's concerns. If an incident has occurred, the PI will report the potential incident to the Centers for Disease Control and Prevention (CDC) Security Incident Response Team and Privacy Officer.</p>
<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>There is no process in place for periodic reviews of the PII contained in the system. ATSDR will delete the email address from the database as soon as the online response to the ACAS is received. ATSDR utilize but will not collect or store telephone numbers during the SMS Text Survey polling.</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 <input type="checkbox"/> Administrators <input type="checkbox"/> Developers <input type="checkbox"/> Contractors <input type="checkbox"/> Others</p> <p>Users will need to have access to PII in order to send links to surveys to</p>
<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>The POC will determine the level of access for each user depending on their role in the study. The study POC will give access to new users.</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>Only ATSDR project staff will have access to PII during online data collection. PII will be deleted as soon as the online survey results are received.</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.

Study staff will complete CDC's annual security awareness training and sign associated rules of behavior.

35 Describe training system users receive (above and beyond general security and privacy awareness training).

The users will not receive additional training.

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.

The study uses the CDC/ATSDR Minor Research Records record control schedule in regard to the retention and destruction of PII. The schedule states that the records should be maintained "at least six years, but no longer than ten years, after the retirement of the system—depending upon program need for scientific, legal, or business reference—then delete/destroy".

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

The PII in the system is secured using a layered approach with appropriate administrative, technical, and physical controls, being implemented.

The administrative controls educate system users of their responsibility to protect PII and legally bind them to do so. These controls include signed rules of behavior, non-disclosure agreements, CDC privacy and security awareness training, and records management training. Records are maintained according to CDC record control policies and procedures.

The technical controls, implemented by the system, act to either allow access to system PII data only to approved users or to make PII data unreadable outside of the system. These controls include encryption, authentication, firewalls, intrusion detection systems, and anti-malware systems.

The physical controls, implemented by the system, restrict access to CDC buildings and areas housing computers used by this system. These controls include guards, identification badges, key cards, locked doors, cipher locks, fences, alarms and closed circuit TV.

**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

Reviewer Notes

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

Reviewer Questions		Answer	
<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"/>