

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

11 Describe the purpose of the system.

Community Based Survey Supports for Healthy Eating and Active Living (CBS SHEAL) is designed to collect survey responses via web-based and telephone from an identified nationally representative baseline database on local government policies and practices to support healthy eating and active living.

The survey will contribute for a better understanding of Complete Street policies, shared use agreements between municipalities and public schools, and nutrition standards in municipal government buildings. Also, it provides a national data point to determine trends in community-based support for healthful eating and physical activity for further data collection for jurisdictions to help improve the health of their communities.

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.)

CBS SHEAL Survey is a web portal that collects specific community-wide planning documents, policies or standards that support physical activity within the community, zoning and design or development codes, transportation policies, the availability of healthy food options, and policies related to employee breastfeeding.

Participants communications include the survey invitation letter, reminder letters, and reminder emails and personalized with respondent name, web survey link and individual PIN, as well as a link to the letter of support. If the name of the appropriate official is not publicly available, the contractor will address the official by title. It also includes the basic information such as community name, mailing address, phone number, and email address for the sampled individuals, as well as other information needed for tracking response rates by sample batch and sampling strata.

The study is administered by an indirect contractor of CDC whose staff access their corporate network with 2-factor authentication prior to being able to access the system. The system collects and maintains information (name, email address, and phone number) for those staff to be used to issue their user credentials (username and password) for system authentication purposes. CDC users are authenticated via Active Directory (AD). AD is a separate system covered by a separate PIA.

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

CBS SHEAL is designed to collect and store specific community-wide planning documents, policies or standards that support physical activity within the community, zoning and design or development codes, transportation policies, the availability of healthy food options, and policies related to employee breastfeeding and baseline data on local government policies and practices to support healthy eating and active living.

The system is composed of a commercially available software (VOXCO) which used to conduct and house web-based and telephone questionnaires.

Participants communications include the survey invitation letter, reminder letters, and reminder emails and personalized with respondent name, web survey link and individual PIN, as well as a link to the letter of support. If the name of the appropriate official is not publicly available, the contractor will address the official by title. It also includes the basic information such as community name, mailing address, phone number, and email address for the sampled individuals, as well as other information needed for tracking response rates by sample batch and sampling strata.

Authorization to the data will be given only to those who work on the project. Data will be stored for the amount of time as specified in the contract for the project. The study is administered by an indirect contractor of CDC whose staff access their corporate network with 2-factor authentication prior to being able to access the system. The system collects and maintains information (name, email address, and phone number) for those staff to be used to issue their user credentials (username and password) for system authentication purposes. CDC users are authenticated via Active Directory (AD). AD is a separate system covered by a separate PIA.

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 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 checked="" 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	

User credentials
Personal Identification Number (PIN)

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"/>

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.	<p>Directly from an individual about whom the information pertains</p> <p><input type="checkbox"/> In-Person</p> <p><input type="checkbox"/> Hard Copy: Mail/Fax</p> <p><input type="checkbox"/> Email</p> <p><input type="checkbox"/> Online</p> <p><input type="checkbox"/> Other</p> <p>Government Sources</p> <p><input type="checkbox"/> Within the OPDIV</p> <p><input type="checkbox"/> Other HHS OPDIV</p> <p><input type="checkbox"/> State/Local/Tribal</p> <p><input type="checkbox"/> Foreign</p> <p><input checked="" type="checkbox"/> Other Federal Entities</p> <p><input type="checkbox"/> Other</p> <p>Non-Government Sources</p> <p><input checked="" type="checkbox"/> Members of the Public</p> <p><input type="checkbox"/> Commercial Data Broker</p> <p><input checked="" type="checkbox"/> Public Media/Internet</p> <p><input type="checkbox"/> Private Sector</p> <p><input type="checkbox"/> Other</p>
23a	Identify the OMB information collection approval number and expiration date.	In progress
24	Is the PII shared with other organizations?	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</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.	The participants are informed that personal information would be collected prior to consent to do interview. At the time of screening all participants, interviewers will include information about how the data will be used.
26	Is the submission of PII by individuals voluntary or mandatory?	<p><input checked="" type="radio"/> Voluntary</p> <p><input type="radio"/> Mandatory</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.	Individuals can opt-out of the collection or use of their PII by refusing to participate in the study.
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.	Electronic or regular mail is sent when there are any major changes to the system. No major changes that would affect the rights or interests of individuals is anticipated.
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.	Any issues experienced by research participants would be resolved through the contractor's Institutional Review Board (IRB).

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.	This is a one time study therefore no process for periodic review is established.										
31	Identify who will have access to the PII in the system and the reason why they require access.	<table border="1"> <tr> <td data-bbox="732 233 951 359"><input checked="" type="checkbox"/> Users</td> <td data-bbox="951 233 1406 359">Authorized in-direct contractor leadership and program managers for internal management purposes only, including reviewing project</td> </tr> <tr> <td data-bbox="732 359 951 485"><input checked="" type="checkbox"/> Administrators</td> <td data-bbox="951 359 1406 485">Selected, authorized personnel require access to manage, maintain, and support the overall system and information collected via the study.</td> </tr> <tr> <td data-bbox="732 485 951 579"><input checked="" type="checkbox"/> Developers</td> <td data-bbox="951 485 1406 579">Developers are needed to validate and test the application's functionality.</td> </tr> <tr> <td data-bbox="732 579 951 705"><input checked="" type="checkbox"/> Contractors</td> <td data-bbox="951 579 1406 705">In-direct contractor have access develop, validate and test the application's functionality.</td> </tr> <tr> <td data-bbox="732 705 951 768"><input type="checkbox"/> Others</td> <td data-bbox="951 705 1406 768"></td> </tr> </table>	<input checked="" type="checkbox"/> Users	Authorized in-direct contractor leadership and program managers for internal management purposes only, including reviewing project	<input checked="" type="checkbox"/> Administrators	Selected, authorized personnel require access to manage, maintain, and support the overall system and information collected via the study.	<input checked="" type="checkbox"/> Developers	Developers are needed to validate and test the application's functionality.	<input checked="" type="checkbox"/> Contractors	In-direct contractor have access develop, validate and test the application's functionality.	<input type="checkbox"/> Others	
<input checked="" type="checkbox"/> Users	Authorized in-direct contractor leadership and program managers for internal management purposes only, including reviewing project											
<input checked="" type="checkbox"/> Administrators	Selected, authorized personnel require access to manage, maintain, and support the overall system and information collected via the study.											
<input checked="" type="checkbox"/> Developers	Developers are needed to validate and test the application's functionality.											
<input checked="" type="checkbox"/> Contractors	In-direct contractor have access develop, validate and test the application's functionality.											
<input type="checkbox"/> Others												
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The contractor implements access on the least privilege method. Only people whose jobs require access to the data are granted the appropriate level of access.										
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.	Administrative- and program-level access to the system by the contractor's leadership, managers, and program project officers is determined by the level of information needed to monitor project, program, and contractor-wide performance information, i.e., project officers only have access to information on the grantees and grant programs that they manage. For contractual staff, those with access to the system and to PII via the system are limited to those who assist in managing, securing, developing, operating, and otherwise supporting the system, or who assist grantee users as they navigate the system or need to update their own PII. All access is granted through Active Directory. Individual Active Directory groups are created for each project and only staff requiring access to the specific project information are added to the project group.										
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 contractor employees are required to take Security Awareness, Data Governance and Privacy training, as well as Ethics training upon hire and annually thereafter.										
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?	<input checked="" type="radio"/> Yes <input type="radio"/> No										

<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>The retention and disposition of any PII included in CBS SHEAL data and any reports generated from such data conforms with requirements outlined in General Records Schedule (GRS) 1.2 for Grant and Cooperative Agreement Records (see NARA Transmittal 29, dated December 2017). The specific records retention schedules are identified in Item 010, DAA-GRS-2013-0008-0007 and in Item 021, DAA-GRS-2013-0008-0006.</p> <p>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.</p>	
<p>38 Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.</p>	<p>Administrative controls include a system security plan, contingency plan, regular back up of files and storage of backups off site, role-based security awareness training, least privilege access enforced through Active Directory groups, separate user and privileged accounts for administrators, policies and procedures in place for retention and destruction of PII.</p> <p>Technical controls include identification and authentication using unique user IDs, passwords, and smart cards, use of firewalls and intrusion detection/prevention systems, virus scanning software on all computers, and a security information and event management (SIEM) solution.</p> <p>Physical controls include security guards, identification badges, key cards, and closed circuit TV.</p>	
<p>39 Identify the publicly-available URL:</p>	<p>TBD-in development</p>	
<p>40 Does the website have a posted privacy notice?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>	
<p>40a Is the privacy policy available in a machine-readable format?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>	
<p>41 Does the website use web measurement and customization technology?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>	
<p>42 Does the website have any information or pages directed at children under the age of thirteen?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>	
<p>43 Does the website contain links to non- federal government websites external to HHS?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>	
<p>General Comments</p>		

OPDIV Senior Official for Privacy Signature	
------------------------------------------------	--