

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

8a Date of Security Authorization

11 Describe the purpose of the system.

Under the authority of the Immigration and Nationality Act (INA), CDC has the regulatory responsibility to ensure that state or local health officials at the U.S. resettlement destination of each refugee are notified promptly of the refugee arrivals and provided all applicable medical records. Each refugee or immigrant who enters the United States must undergo a medical examination in their country of origin. These legally required medical examinations identify persons with inadmissible conditions of public health significance before they enter the United States.

The EDN system is a centralized electronic reporting system that collects health information on all newly arriving refugees and newly arriving immigrants with medical condition of public health significance. Information in the EDN system is used to notify state health departments in all 50 states and the District of Columbia (DC) about these arrivals. The objectives of EDN are to 1) provide timely and accurate medical notifications to U.S. health departments of all newly arriving refugees and immigrants with health conditions that might require follow-up; 2) monitor diseases of public health significance, such as tuberculosis; and 3) provide data for evidence-based recommendations to the U.S. and international public health communities, as well as to federal partners.

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.)

The EDN system collects information about immigrants and refugees including surname, given name, birth date, birth place (city/country), sex, passport number, case or alien number, present address of residence (city, postal code, country), intended US address (city, state, postal code), medical notes, email, weight, and height. The panel physician performing exam is also collected. Some of the information is provided on paper forms and is manually entered into the EDN system, and some is electronically transmitted into EDN.

The EDN system uses the CDC Smart cards and Active Directory (AD) for internal user authentication and Secure Access Management Services (SAMS) for external user authentication. Both CDC AD and SAMS are separate systems with their own PIA documents. User passwords are stored and maintained in the CDC AD and SAMS systems, but not in the EDN system. However, user IDs are stored in the EDN system permanently. Active Directory is a separate system with its own PIA. SAMS is a separate system with its own PIA.

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

The EDN system networks CDC researchers, quarantine stations, and state health departments that perform surveillance for immigrants requiring medical treatment follow-up upon entering the United States. The EDN application provides federal and state public health officials with data to evaluate the effectiveness of follow-up on Tuberculosis (TB) cases, as well as the ability to record the results of domestic follow up examination.

Following information about immigrants and refugees, including their PII information, is collected in EDN system: surname, given name, birth date, birth place (city/country), sex, passport number, case or alien number, present address of residence (city, postal code, country), intended US address (city, state, postal code), medical notes, email, weight, and height. In addition, the panel physician performing exam is also collected. The above information is collected under the requirement of the authority of the Immigration and Nationality Act to notify US health partners of US arrivals of all refugees and immigrants with notifiable health conditions as well as the overseas medical information.

EDN data is shared with State and Local Health Departments for federally mandated follow-up persons' arrival in their jurisdiction.

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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 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 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 checked="" type="checkbox"/> Passport Number
<input type="checkbox"/> Taxpayer ID	

Birth country
Alien Number
Sex
Birth City

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 type="checkbox"/> Patients
Other <input type="text" value="Aliens"/>

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

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.

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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.

1405-0113 Expiration: 10/31/2020

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
- State and Local Health Departments for fed
- 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)).	N/A
24c	Describe the procedures for accounting for disclosures	The EDN Helpdesk tracks for accounting for disclosures in an Access database. There is also an organized email folder system for requests that come in through the email box.
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.	CDC does not collect the original data. PII and other personal information are collected by the forms of the U.S. Department of State in immigrant or refugee medical exams. Privacy Act Notice on the form states how the information is going to be used. Immigrants or refugees may decline to provide the PII requested by the U.S. Department of State. In that event the U.S. Department of State may delay or prevent the processing of their case.
26	Is the submission of PII by individuals voluntary or mandatory?	<input checked="" type="radio"/> Voluntary <input type="radio"/> 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.	Immigrants or refugees may decline to provide the PII requested by the U.S. Department of State. In that event the U.S. Department of State may delay or prevent the processing of their case.
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.	The consent for original uses is obtained during the initial PII collection. Repeated notification for changes would be infeasible given the size of the dataset and the potential for individuals moving from their location. The uses for the PII are tied to regulatory activity around health related inadmissibility or response to communicable disease and domestic evaluation.
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.	Immigrants or refugees may notify CDC via point of contact or state/local health department if their PII is incorrect or inappropriately used.
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.	There are processes in place for program period reviews of PII contained in the system to ensure the data's completeness, integrity, availability, accuracy and relevancy. Refugee records are reconciled monthly with records received from the International Organization for Migration (IOM) via the electronic interface. Records are reconciled routinely with federal partners such as the Department of State (Consular Affairs and the Bureau of Population, Refugees, and Migration) to ensure completeness and data integrity. Sample records from the daily notification of arrivals report received from Customs and Border Protections (CBP) are cross referenced with records that are in EDN.

31	Identify who will have access to the PII in the system and the reason why they require access.	<input checked="" type="checkbox"/> Users	Users require access to medical data for manual data entry.
		<input checked="" type="checkbox"/> Administrators	Administrators require access to PII for helpdesk support and user management.
		<input checked="" type="checkbox"/> Developers	Developers require access to PII to troubleshoot data issues and reset entry records when required.
		<input type="checkbox"/> Contractors	
		<input checked="" type="checkbox"/> Others	Refuge and Tuberculosis (TB) coordinators at US health department require access to PII to ensure proper medical follow up is performed and
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The Role-based access (RBAC) is used in EDN system. User identification process is through CDC Secure Access Management Services (SAMS). After a user is approved to	
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 privileged model is utilized to allow those with access to PII to only access the minimum amount of information necessary to perform their job. EDN predefined user groups and roles limit those with access to PII to only the minimum amount of information necessary to perform their job. Non-CDC users can only access their own jurisdiction data based on their role and jurisdiction defined.	
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 CDC personnel are required to acknowledge a Rules of Behavior attesting to their understanding of the privacy requirements.	
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	
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. Record copy of study reports are maintained in agency from two to three years in accordance with retention schedules. Source documents for computer are 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 are retained for 20 years; for longer periods if further study is needed. EDN system adheres to the CDC Records and Retention schedule GRS 20.2 and 20.6	

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

Administrative Controls include Federal, HHS, and CDC specific Privacy, Risk Assessment, and Incident Management Policies, annual system privacy impact assessments; and mandatory annual security & privacy awareness training.

Technical Controls include the Data Entry module can only be accessed by CDC registered users that have CDC network access using a smartcard. Health department users also need to be registered EDN users and can only access the system via the Secured Access Management System (SAMS) where they go through a level III authentication. The system is backed up on a nightly basis with copies of the files stored off site in a secure fireproof safe. All users must be registered to have access.

Physical Controls include access to the CDC Clifton Road facility where the mainframe computer is located is controlled by a cardkey system. The hard copy records are kept in locked cabinets in locked rooms. Access to the data entry center is only available to smartcard holders inside CDC facilities where there is also physical CDC security.

General Comments

OPDIV Senior Official for Privacy Signature