

Privacy Impact Assessment Form

v 1.21

Status

Form Number

0920-1182

Form Date

2/19/2021

Question

Answer

1 OPDIV:

CDC

2 PIA Unique Identifier:

0920-1182

2a Name:

Formative Research to Develop HIV Social Marketing Campaign

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

Team Lead

POC Name

Euna M. August

POC Organization

Centers for Disease Control and P

POC Email

wvj3@cdc.gov

POC Phone

(404) 639-8297

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	Not applicable	
10	Describe in further detail any changes to the system that have occurred since the last PIA.	Not applicable	
11	Describe the purpose of the system.	The purpose of this information collection request is to conduct formative research with healthcare providers in support of "Let's Stop HIV Together", an HIV prevention-focused social marketing campaign funded by CDC. The formative research will involve conducting semi-structured, in-depth interviews (in-person or via video conference or telephone) with healthcare providers who will also be asked to complete a brief, web-based companion survey. The information collected through the system will be used by CDC to inform the development and/or revision of campaign-related messages, concepts, and materials about HIV prevention, testing, and care for healthcare providers.	
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>CDC's contractor and/or a third-party vendor will recruit participants for the interviews. Contractors are indirect. The third-party vendor's systems will collect and store responses to web-based survey questions. Responses will include sociodemographic characteristics (e.g., race/ethnicity, gender, age, etc.), clinical practice characteristics (e.g., practice type, provider type, area of expertise, years in practice, patient characteristics, etc.), information needs, use of electronic media, patient-provider communication, and HIV screening practices.</p> <p>In addition, the recruiters will collect personally-identifiable information (PII) during the recruitment process, including participants names, email and physical addresses, phone numbers, and email addresses. Depending on the recruitment needs for the round of data collection, services of a sub-contractor (i.e., third party vendor) will be acquired to facilitate identification of participants who meet our selection/inclusion criteria. This may vary.</p>	

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

The overall purpose of this data collection is to gather input from healthcare providers on HIV-related topics to help inform the development of the Let's Stop HIV Together communication campaign. The primary data collection mode is individual interviews which will be supplemented with quantitative data gathered through a brief companion web-based survey. During recruitment, PII will be collected so that recruiters can remind participants of upcoming interview appointments. All PII will be kept in locked file cabinets or secure online servers and will be destroyed after the interviews are completed. No PII will be sent to CDC. Further, PII will not be linked to survey or interview responses.

For the companion survey, the survey vendor will email participants a link to the voluntary, self-administered survey. The surveys use Transport Layer Security (TLS version 1.2) encryption for all transmitted data. Data at rest are also encrypted, and data are isolated from other user's data. The data are encrypted end-to-end and only the contractor can decrypt the data. The information that will be collected, maintained, and shared by the survey system is described in #12. The survey does not involve collection of PII. The PII will only be collected by the contractor/sub-contractor for the purpose of recruitment. These data will be stored and encrypted and will only be used for the recruitment process. Authentication is via username and password; PII will be destroyed after the data collection process and will not be transferred to CDC.

- 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	<input type="text" value="Other..."/>
<input type="text" value="Other..."/>	<input type="text" value="Other..."/>
<input type="text" value="Other..."/>	<input type="text" value="Other..."/>

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?	<input type="text" value="500-4,999"/>
18	For what primary purpose is the PII used?	<input type="text" value="To contact and remind participants of upcoming interview appointments."/>
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	<input type="text" value="None"/>
20	Describe the function of the SSN.	<input type="text" value="NA"/>
20a	Cite the legal authority to use the SSN.	<input type="text" value="NA"/>
21	Identify legal authorities governing information use and disclosure specific to the system and program.	<input type="text" value="NA"/>
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: <input type="text"/> Published: <input type="text"/> Published: <input type="text"/> <input type="checkbox"/> In Progress

<p>23 Identify the sources of PII in the system.</p>	<p>Directly from an individual about whom the information pertains</p> <p> <input type="checkbox"/> In-Person <input type="checkbox"/> Hard Copy: Mail/Fax <input type="checkbox"/> Email <input type="checkbox"/> Online <input checked="" type="checkbox"/> Other </p> <p>Government Sources</p> <p> <input type="checkbox"/> Within the OPDIV <input type="checkbox"/> Other HHS OPDIV <input type="checkbox"/> State/Local/Tribal <input type="checkbox"/> Foreign <input type="checkbox"/> Other Federal Entities <input type="checkbox"/> Other </p> <p>Non-Government Sources</p> <p> <input type="checkbox"/> Members of the Public <input type="checkbox"/> Commercial Data Broker <input type="checkbox"/> Public Media/Internet <input type="checkbox"/> Private Sector <input type="checkbox"/> Other </p>
<p>23a Identify the OMB information collection approval number and expiration date.</p>	<p>OMB#: 0920-1182 Expired: May 31, 2020 This information collection is under review for reinstatement. Once approved by the OMB, another expiration date will be assigned three years from the approval date. OMB number will not change.</p>
<p>24 Is the PII shared with other organizations?</p>	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p>
<p>24a Identify with whom the PII is shared or disclosed and for what purpose.</p>	<p> <input type="checkbox"/> Within HHS <input type="checkbox"/> Other Federal Agency/Agencies <input type="checkbox"/> State or Local Agency/Agencies <input type="checkbox"/> Private Sector </p>
<p>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)).</p>	<p>none</p>
<p>24c Describe the procedures for accounting for disclosures</p>	<p>none</p>
<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 recruiters are responsible for notifying individuals that their PII will be collected and why it is necessary to do so.</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>

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.	Participation is voluntary. Participants who opt out of collection or use of PII, however, will be ineligible to participate.
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.	NA - (a) No changes will be made to the system and (2) PII is destroyed upon completion of interviews.
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.	We do not anticipate that this will be an issue due to the nature of the data collection. However, the consent form tells individuals that they can contact the contractor's project director and/or office of research protection (ORP) if they have concerns. Contact information for these entities are provided along with the contractor's hours of operation.
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.	No periodic reviews are planned.
31	Identify who will have access to the PII in the system and the reason why they require access.	<div> <input type="checkbox"/> Users </div> <div> <input type="checkbox"/> Administrators </div> <div> <input type="checkbox"/> Developers </div> <div> <input checked="" type="checkbox"/> Contractors </div> <div> <input type="checkbox"/> Others </div> <div>Contractors will have access to PII only for the purpose of reminding</div>
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Only the contractor and/or the third party can access PII.
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.	Only authorized users (i.e., recruitment staff) will have access to PII. PII will be destroyed upon completion of the interviews.
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.	No more than 2 contractor staff will have access to data files containing PII. These staff have received training from the Collaborative Institutional Training Initiative (CITI) Program on human subjects, including data privacy and research ethics. Contractor staff are also required to complete an IT security awareness training. Third-party vendor staff involved with the study will be required to sign a privacy agreement prior to recruitment. CDC staff will complete all required trainings on human subjects and data privacy, including the Security and Awareness Training.
35	Describe training system users receive (above and beyond general security and privacy awareness training).	NA
36	Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	<input type="radio"/> Yes <input checked="" 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.	The contractor and third-party vendor will destroy PII upon interview completion. Online files will be deleted, and paper records will be stored securely in a locked receptacle until shredded. We will adhere to the records control schedules, as defined within the CDC/ATSDR Records Control Schedule.	
38 Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	<p>Administrative controls: All recruitment staff will be trained prior to recruitment, which will entail procedures for collecting, storing, and eventual destruction of PII. Additionally, third-party recruiters will be required to sign a confidentiality agreement before they are permitted to work on the study.</p> <p>Technical controls: Access to PII will be limited to recruitment staff. PII will be locked in a file cabinet or stored on online servers accessible only to staff who are approved to access the information by the contractor's project director. Survey data, which does not include PII, will initially be stored by the survey vendor. The data will be encrypted at rest and in transit, from the participant to the survey vendor and from the survey vendor to the contractor. Data are encrypted end-to-end and only the contractor will have access to the data using a master key. When data are transported to the contractor over TLS, they are then saved to a network share drive behind a firewall which only authorized users have access to.</p> <p>Physical controls: Computers are password-protected, and access to online servers is granted to staff permitted to work on the project by the project director. Access to facilities is restricted to contractor employees.</p>	
<p>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.</p>		
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	<input type="text"/>	
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"/>	

Reviewer Questions		Answer
5	Is this a candidate for PII minimization?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
6	Does the PIA accurately identify data retention procedures and records retention schedules?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
7	Are the individuals whose PII is in the system provided appropriate participation?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
8	Does the PIA raise any concerns about the security of the PII?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
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		
10	Is the PII appropriately limited for use internally and with third parties?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
11	Does the PIA demonstrate compliance with all Web privacy requirements?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
12	Were any changes made to the system because of the completion of this PIA?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
General Comments		
OPDIV Senior Official for Privacy Signature		HHS Senior Agency Official for Privacy