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Privacy Impact Assessment Form

v 1.21

Status | Form Number | Form Date 07/28/20

	Question	Answer
1	OPDIV:	CDC
2	PIA Unique Identifier:	TBD
2a	Name:	Awardee Lead Profile Assessment
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.	Operations and Maintenance
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: Lead Health Scientist POC Name: Perri Ruckart POC Organization: NCEH POC Email: afp4@cdc.gov POC Phone: 700-488-3808
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

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8c	Briefly explain why security authorization is not required	Several authorized CDC systems will be used to collect and maintain the data from this study.
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 this data collection is to collect information that CDC can use to: 1) identify common characteristics of funded childhood lead poisoning prevention programs, and 2) inform guidance, resource development, and technical assistance for the activities that the CDC conducts in support of the ultimate goal to eliminate blood lead in children.
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 system will collect and maintain the following types of information: Program (program name, name, email, city, and state) Survey (governing laws/policies, prevention strategies, nutritional assessments, developmental assessments, reimbursement rates, blood lead level action rates, interventions, etc.) Only cooperative agreement recipients will be asked to participate in this survey. Data will be collected annually from the project managers of funded lead poisoning prevention programs of state and local governments (or their bona fide fiscal agents) through our cooperative agreement. Only aggregrate data will be disseminated. Data will be collected using a web-based link to an Epi Info 7 survey or using an emailed survey in Microsoft Word format. The data will then transfered to Microsoft Excel for storage on the CDC shared drive. Data will be protected with appropriate controls as described in the system documentation for the Epi Info web survey, an authorized CDC information collection system.

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13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	The purpose of this annual assessment under the cooperative agreement is to identify jurisdictional legal frameworks governing CDC-funded childhood lead poisoning prevention programs in the United States and strategies for implementing childhood lead poisoning prevention activities. The system will collect and maintain the following types of information: Program (program name, name, email, city, and state) Survey (governing laws/policies, prevention strategies, nutritional assessments, developmental assessments, reimbursement rates, blood lead level action rates, interventions, etc.) Program information is collected to contact cooperative agreement recipients about the survey. Survey information is collected to: 1) identify common characteristics of funded childhood lead poisoning prevention programs and 2) inform guidance, resource development, and technical assistance activities conducted by the CDC Childhood Lead Poisoning Prevention Program (CLPPP) in support of the ultimate goal, which is blood lead elimination in children The PII used in the study is already in the center because these individuals are POCs for grants and cooperative agreements. The purpose of the study is to send a survey to these individuals to evaluate these programs. T Assessment findings will be shared on the CDC CLPPP website and in response to inquiries by the public, press, and Congress. The dissemination of results will support the ability for both funded and non-funded jurisdictions to: 1) identify policies and other factors that support or hinder childhood lead poisoning prevention efforts, 2) understand what strategies are being used by funded state and local governments (or their bona fide fiscal agents) to implement childhood lead poisoning prevention activities, and 3) use this knowledge to develop and apply similar strategies to support the national agenda to eliminate childhood lead poisoning. Data will be collected using a web-based link to an Epi Info 7 survey or using an emailed survey in Microsoft Word format. The data will then transfered to Microsoft Excel for storage on the CDC shared drive. Data will be protected with appropriate controls as described in the system documentation for the Epi Info web survey, an authorized CDC information collection system.
14	Does the system collect, maintain, use or share **PII**?	(•) Yes ( ) No

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15	Indicate the type of PII that the system will collect or maintain.	☐ Social Security Number ☐ Date of Birth ☒ Name ☐ Photographic Identifiers ☐ Driver's License Number ☐ Biometric Identifiers ☐ Mother's Maiden Name ☐ Vehicle Identifiers ☒ E-Mail Address ☐ Mailing Address ☐ Phone Numbers ☐ Medical Records Number ☐ Medical Notes ☐ Financial Account Info ☐ Certificates ☐ Legal Documents ☐ Education Records ☐ Device Identifiers ☐ Military Status ☐ Employment Status ☐ Foreign Activities ☐ Passport Number ☐ Taxpayer ID Other... city and state Other... Other... Other...
16	Indicate the categories of individuals about whom PII is collected, maintained or shared.	☐ Employees ☐ Public Citizens ☒ Business Partners/Contacts (Federal, state, local agencies) ☐ Vendors/Suppliers/Contractors ☐ Patients Other
17	How many individuals' PII is in the system?	<100
18	For what primary purpose is the PII used?	The primary purpose of the PII is to contact the survey participants.
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	There is not secondary purpose of the PII.
20	Describe the function of the SSN.	N/A
20a	Cite the **legal authority** to use the SSN.	N/A
21	Identify **legal authorities** governing information use and disclosure specific to the system and program.	N/A
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.	Published: Published: Published: ☐ In Progress

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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 revision package is currently undergoing review. The Awardee Lead Profile Assessment was previously approved under OMB Control No. 0920-1215, expiration date 2/28/2021.
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	The system does not disclose information outside CDC.
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.	There is no process in place to notify individuals that the PII will be collected. PII is already collected as part of their cooperative agreement application.
26	Is the submission of PII by individuals voluntary or mandatory?	◉ Voluntary ○ Mandatory

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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.	There is no process to opt-out of the collection or use of their PII. PII is already collected as part of their cooperative agreement application.
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.	There is no process to notify and obtain consent from the individuals PII in the system. This PII was already collected by another system.
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.	There is no process in place to resolve an individual's concerns. PII is collected as part of the survey participants' cooperative agreement applications.
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 is no process in place for periodic reviews of PII contained in the system. The PII was collected by another system.
31	Identify who will have access to the PII in the system and the reason why they require access.	☐ Users ☒ Administrators — To maintain data ☐ Developers ☐ Contractors ☐ Others
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The study's principal investigator (PI) determines who will have access to PII. The PI will configure the permissions each user will receive for accessing study data.
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 method is used to ensure that those with access to PII are only able to access the minimum amount necessary to perform their job responsibilities. Examples of controls that are employed are: (1) SQL read/write permissions that are controlled by user roles and privileges. (2) Active Directory controls administrator access. (3) E-Authentication control for external users.
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.	Personnel are required to undergo Annual Security and Privacy Awareness Training (SAT).
35	Describe training system users receive (above and beyond general security and privacy awareness training).	Users receive no additional training beyond general security and privacy awareness training.
36	Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	◉ Yes ○ No

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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, disposed, stored, handled, and viewed in accordance with the ATSDR Comprehensive Records Control Schedule (B-371), GSR 20.2c& d, and GSR 20.6. Current procedures allow the system manager to keep the records for 20 years unless needed for further study. Registry records will be actively maintained as long as funding is provided for by legislation. Retention periods vary depending on the type of record. Source documents for computer tapes or disks are disposed of when no longer needed in the study as determined by the system manager, and as provided in the signed consent form, as appropriate.
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.
39	Identify the publicly-available URL:	http://www.cdc.gov/EpiInfo
40	Does the website have a posted privacy notice?	(•) Yes ( ) No
40a	Is the privacy policy available in a machine-readable format?	(•) Yes ( ) No
41	Does the website use web measurement and customization technology?	( ) Yes (•) No
42	Does the website have any information or pages directed at children under the age of thirteen?	( ) Yes (•) No
43	Does the website contain links to non- federal government websites external to HHS?	(•) Yes ( ) No
43a	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	(•) Yes ( ) No

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Reviewer Questions	Answer
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?	◯ Yes ◯ No
Reviewer Notes		
2	Does the PIA appropriately communicate the purpose of PII in the system and is the purpose justified by appropriate legal authorities?	◯ Yes ◯ No
Reviewer Notes		
3	Do system owners demonstrate appropriate understanding of the impact of the PII in the system and provide sufficient oversight to employees and contractors?	◯ Yes ◯ No
Reviewer Notes		
4	Does the PIA appropriately describe the PII quality and integrity of the data?	◯ Yes ◯ No
Reviewer Notes		
5	Is this a candidate for PII minimization?	◯ Yes ◯ No
Reviewer Notes		
6	Does the PIA accurately identify data retention procedures and records retention schedules?	◯ Yes ◯ No
Reviewer Notes		
7	Are the individuals whose PII is in the system provided appropriate participation?	◯ Yes ◯ No
Reviewer Notes		
8	Does the PIA raise any concerns about the security of the PII?	◯ Yes ◯ No
Reviewer Notes		
9	Is applicability of the Privacy Act captured correctly and is a SORN published or does it need to be?	◯ Yes ◯ No
Reviewer Notes		
10	Is the PII appropriately limited for use internally and with third parties?	◯ Yes ◯ No

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	Reviewer Questions	Answer
Reviewer Notes		
11	Does the PIA demonstrate compliance with all Web privacy requirements?	◯ Yes ◯ No
Reviewer Notes		
12	Were any changes made to the system because of the completion of this PIA?	◯ Yes ◯ No
Reviewer Notes		
General Comments		
OPDIV Senior Official for Privacy Signature	Jarell Oshodi -S Digitally signed by Jarell Oshodi -S Date: 2020.08.28 14:39:46 -04'00'	HHS Senior Agency Official for Privacy