c	_	٠,	$\sim$	
	a	v	e	

## Privacy Impact Assessment Form v 1.47.4 Status Draft 12/15/2016 3:34:08 PM Form Number F-54042 Form Date Question Answer OPDIV: CDC PIA Unique Identifier: P-7550707-649749 2a Name: National Healthcare Safety Network (NHSN) General Support System (GSS) Major Application Minor Application (stand-alone) The subject of this PIA is which of the following? Minor Application (child) C Electronic Information Collection ○ Unknown Identify the Enterprise Performance Lifecycle Phase Operations and Maintenance of the system. ○ Yes 3b Is this a FISMA-Reportable system? No Does the system include a Website or online application available to and for the use of the general No public? Agency Identify the operator. Contractor **POC Title** Branch Chief **POC Name** Daniel Pollock POC Organization | NCEZID/DHQP Point of Contact (POC): **POC Email** Dap1@cdc.gov **POC Phone** 404-639-4237 New Is this a new or existing system? Existing Does the system have Security Authorization (SA)? No December 30, 2016 8b Planned Date of Security Authorization ☐ Not Applicable

11	Describe the purpose of t	he system.
----	---------------------------	------------

NHSN allows participating healthcare facilities to enter data associated with healthcare safety events, such as surgical site infections, antimicrobial use and resistance, bloodstream infections, and healthcare worker vaccinations. NHSN provides analysis tools that generate reports using the aggregated data (reports about infection rates, national and local comparisons, etc). Participating NHSN healthcare facilities can access webbased screens that allow them to enter data associated with healthcare safety events. These data are captured in a relational database at the CDC. Participants can then use NHSN analysis tools to generate reports that are displayed via their web browser.

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.)

NHSN is a voluntary surveillance system. The system requires reporting of the following information:

Patients: patient identification number (may be a medical record number), gender and date of birth. For some patients, birth weight is required.

Healthcare workers: healthcare worker identification number, gender, date of birth, work location, and occupation.
Facilities: facility name, address, county, city, state, zip code, telephone number, identifying number (i.e., CMS provider number and/or American Hospital Association identification number and/or Veterans Administration station code), type, ownership category, affiliation with a medical school (y/n), and bed-size characteristics.

Users: name, address (if different from facility), telephone number, and email address.

Optional information that may be reported to NHSN: Patients: Social security number, secondary identification number, name, ethnicity, and race.

Healthcare workers: name, address, work and home phone numbers, email address, born in United States (y/n), ethnicity, race, and date of employment.

Users: fax number, pager number, and title.

NHSN is the nation's most comprehensive medical event tracking system used by more than 16,000 U.S. healthcare facilities in all 50 states, Washington, D.C., and Puerto Rico. Data from NHSN is used for tracking of healthcare-associated infections and guides infection prevention activities that protect patients. CMS and other payers use these data to determine incentives for performance and members of the public may use the data to select among available providers. Each of these parties relies on the completeness and accuracy of the data.

NHSN allows participating healthcare facilities to enter data

associated with healthcare safety events, such as surgical site infections, antimicrobial use and resistance, bloodstream infections, and healthcare worker vaccinations. NHSN provides analysis tools that generate reports using the aggregated data (reports about infection rates, national and local comparisons, etc). NHSN also provides links to best practices, guidelines, and lessons learned. Participating NHSN healthcare facilities can access web-based screens that allow them to enter data

associated with healthcare safety events.

Any U.S. healthcare institution including hospitals, outpatient centers, and long-term care facilities may enroll in NHSN provided they have access to the Internet. Along with NHSN there is an NHSN Registration server that provides healthcare administrators with a way to register their facility in NHSN without having a digital certificate. After registering their facility they will be given instructions on how to get a digital certificate and begin using the main NHSN application. This registration application also provides a way for users to accept the NHSN Rules of Behavior before accessing the main NHSN application.

14 Does the system collect, maintain, use or share PII?

Provide an overview of the system and describe the

information it will collect, maintain (store), or share,

either permanently or temporarily.

Yes

 $\bigcirc$  No

			□ Date of Birth	
		<b>⊠</b> Name	☐ Photographic Identifiers	
		Driver's License Number	☐ Biometric Identifiers	
		☐ Mother's Maiden Name	☐ Vehicle Identifiers	
			⊠ Mailing Address	
			Financial Account Info	
		☐ Certificates	Legal Documents	
15	Indicate the type of PII that the system will collect or maintain.	☐ Education Records	☐ Device Identifiers	
	Thursday.	☐ Military Status		
		Foreign Activities	Passport Number	
		☐ Taxpayer ID		
	Indicate the categories of individuals about whom PII is collected, maintained or shared.	☐ Employees		
		□ Public Citizens		
16		Business Partners/Contacts (Federal, state, local agencies)		
10		☐ Vendors/Suppliers/Contractors		
		Patients		
		Other No		
17	How many individuals' PII is in the system?	1,000,000 or more		
		Data from NHSN is used for trac	cking of healthcare-associated	
18	For what primary purpose is the PII used?	infections.	Ť	
10	Describe the secondary uses for which the PII will be	Data from NHSN is also used as	a guide for infection	
19	used (e.g. testing, training or research)	prevention activities that prote	-	
	Describe the function of the SSN.	SSNs are vital to the overall ope		
		hospitals whose data is entered track a patient by SSN. Also state	· · · · · · · · · · · · · · · · · · ·	
		have been granted access to th	e data in their state by their	
20		constituent hospitals may requ state of Pennsylvania for exam		
_•		reporting of Healthcare Associa	nted Infections using NHSN and	
		as part of the state mandate requires the records to be identified by SSNs. This allows Pennsylvania to download data		
		from NHSN about patients in their state and link that data to		
		payment information.		

20a	CHETHE EUGLAUMORITY TO USE THE 3 318	E.O. 9397, November 22, 1943 (as Amended by E.O. 13478, 18 November 2008)	
21	Identify <b>legal authorities</b> governing information use and disclosure specific to the system and program.	Public Health Service Act, Section 301, "Research and Investigation," (42 U.S.C. 241); and Sections 304, 306 and 308(d) which discuss authority to maintain data and provide assurances of confidentiality for health research and related activities (42 U.S.C. 242 b, k, and m(d)).	
22	Are records on the system retrieved by one or more PII data elements?	○ Yes	
23	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains	
23a	Identify the OMB information collection approval number and expiration date.	OMB No. 0920-0666, expiration Date: 12/31/2018	
24	Is the PII shared with other organizations?	<ul><li><b>⊙</b> Yes</li><li>○ No</li></ul>	
24a	Identify with whom the PII is shared or disclosed and for what purpose.	<ul> <li>□ Within HHS</li> <li>□ Other Federal Agency/Agencies</li> <li>□ State or Local Agency/Agencies</li> <li>Select Healthcare facilities in the U.S. These facilities may track a patient using SSN. Specifically PA requires by law the reporting of healthcare associated infections using NHSN and as part of the state mandate requires the records to be identified by SSNs.</li> <li>□ Private Sector</li> </ul>	

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)).	be found at http://wv announcment.html. LA, MN, and NY. Each data—you can read e	NHSN Data Use Agreement document can ww.cdc.gov/hai/surveillance/DUA-So far we have agreements with AZ, KY, a state has requested access to different each state's specifics by clicking on the add.gov/HAI/state-based/index.html. Each as its own data.
24c	Describe the procedures for accounting for disclosures	The NHSN User Support Helpdesk currently tracks inquiries for accounting for disclosures via management of an organized email folder system.	
25	that their personal information will be collected. If	NHSN is a public health surveillance system and does not require obtaining consent from individuals whose data are submitted and stored in the system.	
26	Is the submission of PII by individuals voluntary or mandatory?	Voluntary     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.	There is no option to object to the information collection because NHSN is a public health surveillance system that requires healthcare facilities to submit patient data for surveillance.	
28	and/or data uses have changed since the notice at	Facilities that participate in NHSN are responsible for letting individuals know if their PII is being used and as such any concerns regarding this should be directed to the facility.	
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.	Facilities that participate in NHSN are responsible for letting individuals know if their PII is being used and as such any complaints regarding this should be directed to the facility.	
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 umbrella process is in place to ensure the accuracy of the PII contained in the system. Facilities participating in NHSN are responsible for the submission and verification of PII in NHSN.	
		⊠ Users	Epidemiologic Analysis
	Identify who will have access to the PII in the system and the reason why they require access.		Database Management
31		☐ Developers	
			Epidemiologic Analysis
		Others	
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Role Based Access Co which system users n	ontrols (RBAC) are in place to determine nay 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.	The least privilege model is utilized to allow those with access to PII to only access the minimum amount of information necessary to perform their job.
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 CDC personnel are required to complete annual Security and Privacy Awareness training.
35	Describe training system users receive (above and beyond general security and privacy awareness training).	Users 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?	<ul><li>Yes</li><li>No</li></ul>
37	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.	CDC Records Control Policy applies. Records are retained and disposed of in accordance with the CDC Records Control Schedule for NHSN records. Records are retained for various periods of time depending upon how useful they are considered to be, in accordance with NHSN policy. Some records of users may be maintained indefinitely. Disposal methods include burning or shredding hard copy and erasing computer tapes and disks. N1-442-09-1, item 1 ()
38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	The system date is protected by residing within SAMS and requires each user to have CDC-approved identity proofing in order to access the system. Further, only authorized CDC staff, contractors, and guest researchers have access to the data. Each must sign non-disclosure agreements prior to system access. No data are allowed to reside on portable devices (e.g., laptops, thumb drives, storage media). Physical security is provided by housing NHSN servers in a secured facility protected by guards and a cardkey system. Access to the computer room is controlled by a cardkey and security code (numeric keypad) system. Access to the data entry area is also controlled by a cardkey system.
Gene	ral Comments	
OPDIV Senior Official for Privacy Signature		