

Privacy Impact Assessment Form

v 1.21

Status Form Number Form Date

Question

Answer

1 OPDIV:

CDC/CSELS/DSEPD

2 PIA Unique Identifier:

TBD

2a Name:

Training and Continuing Education On-line (TCEO)

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
 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

4/28/2014

<p>9 Indicate the following reason(s) for updating this PIA. Choose from the following options.</p>	<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <input checked="" type="checkbox"/> PIA Validation (PIA Refresh/Annual Review) <input type="checkbox"/> Anonymous to Non-Anonymous <input type="checkbox"/> New Public Access <input type="checkbox"/> Internal Flow or Collection <input type="checkbox"/> Commercial Sources </div> <div style="width: 35%;"> <input type="checkbox"/> Significant System Management Change <input type="checkbox"/> Alteration in Character of Data <input type="checkbox"/> New Interagency Uses <input type="checkbox"/> Conversion </div> </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">Other...</div>
<p>10 Describe in further detail any changes to the system that have occurred since the last PIA.</p>	<div style="border: 1px solid black; padding: 5px;">None</div>
<p>11 Describe the purpose of the system.</p>	<div style="border: 1px solid black; padding: 5px;"> <p>TCEO system allows health professionals to register and complete requirements to receive continuing education credits. Participants access only their own records. It is a web based registration system offering continuing education that addresses core competences, public health issues, public health preparedness and timely updates via distance education and live training events. TCEO includes the following learner support features for participants:</p> <ul style="list-style-type: none"> • Technical support through the toll free 800 number, email box and online information. • Ability to select a downlink site for the satellite broadcast. • Registration for the training event • Access to standard course evaluation and exam online. • Ability to view and print transcript and continuing education certificate. <p>TCEO also allows downlink site administration staff to identify and register downlink sites and monitor participant registration.</p> </div>
<p>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>	<div style="border: 1px solid black; padding: 5px;"> <p>Participants register their profile information. Participants only have access to their own profile information that they have entered. When a participants registers for a course and obtains continuing education credit they are able to print a certificate or transcript of their accomplishment.</p> </div>
<p>13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.</p>	<div style="border: 1px solid black; padding: 5px;"> <p>TCEO collects user information to create their profile. The users then participate in continuing education activities. These activities are tracked and recorded against the users profile. The continuing education information is then available for the user to manually submit the information to their accreditation body for continuing education credits.</p> </div>
<p>14 Does the system collect, maintain, use or share PII?</p>	<div style="text-align: right;"> <input checked="" type="radio"/> Yes <input type="radio"/> No </div>

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 checked="" type="checkbox"/> Certificates	<input type="checkbox"/> Legal Documents
<input checked="" type="checkbox"/> Education Records	<input type="checkbox"/> Device Identifiers
<input checked="" type="checkbox"/> Military Status	<input checked="" type="checkbox"/> Employment Status
<input type="checkbox"/> Foreign Activities	<input type="checkbox"/> Passport Number
<input type="checkbox"/> Taxpayer ID	<input type="text"/>
<input type="text"/>	<input type="text"/>
Professional License Number	<input type="text"/>

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?

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.

Published:

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.

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)).

24c Describe the procedures for accounting for disclosures

<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>Individuals will be notified as to what IIF is being collected from them and how the information will be used or shared when they first log into the system as applicants or alumni and will be available for their review every time they login in thereafter, and alumni will provide electronic consent before they can enter their data.</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>
<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.</p>	<p>An opt-out option is not available. Creating an account in the TCEO system is completely voluntary.</p>
<p>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.</p>	<p>Should major changes ever occur to the system, CDC/CSELS/DSEPD Administrators will notify individuals whose IIF is in the system by email asking them to provide consent as appropriate by either written or electronic notice.</p>
<p>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.</p>	<p>The process of handling a user's concern with PII of the TCEO system would be to contact the email address listed on the webpage. The system administrator would then be responsible for resolving the issue.</p>
<p>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.</p>	<p>Data is maintained by the end user.</p>
<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<p><input checked="" type="checkbox"/> Users <input type="text" value="View and update their own profile"/></p> <p><input checked="" type="checkbox"/> Administrators <input type="text" value="For assisting with password resets and"/></p> <p><input type="checkbox"/> Developers <input type="text"/></p> <p><input type="checkbox"/> Contractors <input type="text"/></p> <p><input type="checkbox"/> Others <input type="text"/></p>
<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>Users have access to only their own profile. TCEO Administrators have the ability to review the profiles entered by the users. Administration privileges is only granted to the staff of the Continuing Education group. (CSELS/DESPD/EDCELSB) A formal request must be approved by the Business Steward prior to access being granted.</p>
<p>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.</p>	<p>The TCEO application utilizes the principle of least privilege access. Users can only see their own information. Administrators would be able to view Users information.</p>
<p>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.</p>	<p>CDC Security Awareness Training (SAT) program</p>

35	Describe training system users receive (above and beyond general security and privacy awareness training).	Application has detailed instructions on how to complete the application from.												
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.	Kept and disposed of in accordance with NARA policies as implemented by CDC/ITSO.												
38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	<p>TCEO Application's PII is secured via:</p> <p>Administrative Controls – include the enforcement of user roles and by having users agree to system Rules of Behavior. Any changes to the application must go through a Change Management process. Contractors sign a nondisclosure agreement. Employees and Contractors must have Back ground checks.</p> <p>Technical Controls – Technical controls are in place to minimize the possibility of unauthorized access, use, or dissemination of the data in the system. The application utilizes role-based access and grants access to the data based on authentication and authorization. TCEO User identification is required through ID's, strong passwords and Smart Cards. The application also utilizes the CDC's infrastructure firewalls, virus protection and intrusion detection systems.</p> <p>Physical Controls - Servers are housed in secure CDC enterprise data centers that limit access to authorized individuals. Physical controls include the use of human guards, identification badges, key cards, and CCTV</p>												
39	Identify the publicly-available URL:	https://www2a.cdc.gov/TCEOnline												
40	Does the website have a posted privacy notice?	<input checked="" type="radio"/> Yes <input type="radio"/> No												
40a	Is the privacy policy available in a machine-readable format?	<input checked="" type="radio"/> Yes <input type="radio"/> No												
41	Does the website use web measurement and customization technology?	<input checked="" type="radio"/> Yes <input type="radio"/> No												
41a	Select the type of website measurement and customization technologies is in use and if it is used to collect PII. (Select all that apply)	<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%; text-align: left; border-bottom: 1px solid black;">Technologies</th> <th style="width: 40%; text-align: left; border-bottom: 1px solid black;">Collects PII?</th> </tr> </thead> <tbody> <tr> <td style="border-bottom: 1px solid black;"><input type="checkbox"/> Web beacons</td> <td style="border-bottom: 1px solid black;"><input type="radio"/> Yes <input type="radio"/> No</td> </tr> <tr> <td style="border-bottom: 1px solid black;"><input type="checkbox"/> Web bugs</td> <td style="border-bottom: 1px solid black;"><input type="radio"/> Yes <input type="radio"/> No</td> </tr> <tr> <td style="border-bottom: 1px solid black;"><input checked="" type="checkbox"/> Session Cookies</td> <td style="border-bottom: 1px solid black;"><input type="radio"/> Yes <input checked="" type="radio"/> No</td> </tr> <tr> <td style="border-bottom: 1px solid black;"><input type="checkbox"/> Persistent Cookies</td> <td style="border-bottom: 1px solid black;"><input type="radio"/> Yes <input type="radio"/> No</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Other... <input style="width: 100px; height: 20px;" type="text"/></td> <td style="border-bottom: 1px solid black;"><input type="radio"/> Yes <input type="radio"/> No</td> </tr> </tbody> </table>	Technologies	Collects PII?	<input type="checkbox"/> Web beacons	<input type="radio"/> Yes <input type="radio"/> No	<input type="checkbox"/> Web bugs	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="checkbox"/> Session Cookies	<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="checkbox"/> Persistent Cookies	<input type="radio"/> Yes <input type="radio"/> No	Other... <input style="width: 100px; height: 20px;" type="text"/>	<input type="radio"/> Yes <input type="radio"/> No
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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

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