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Privacy Impact Assessment Form

v 1.21

Status | Form Number | Form Date 06/02/21

	Question	Answer
1	OPDIV:	CDC/ATSDR/OIA/TS
2	PIA Unique Identifier:	TBD
2a	Name:	Evaluating the Association between Serum Concentrations of Pe
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.	Development
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: Environmental Health Scientist POC Name: Melanie Buser POC Organization: ATSDR/OIA/TS POC Email: wyf9@cdc.gov POC Phone: 770-488-3311
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	The study will use multiple CDC authorized systems for the collection, storage, and analysis of data.
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.	In 2019 and 2020, the Agency for Toxic Substances and Disease Registry (ATSDR) conducted statistically based biomonitoring PFAS exposure assessments (EAs) in eight communities that had documented exposures to PFAS in drinking water. ATSDR also supported two EAs that were designed to test the PFAS Exposure Assessment Technical Tools (PEATT). PFAS concentrations were measured in serum collected from EA and PEATT assessment participants. During the same period, ATSDR initiated a health study at the Pease International Tradeport that included measurement of participants' PFAS serum concentrations. This follow-up study will recruit participants from the above studies who have existing PFAS serum measurements. The proposed study will assess the association between PFAS serum concentrations and the self-reported frequency of various groups of symptoms of viral infection (as a marker for susceptibility to viral infection).
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: Participant Info (name, email, mailing address, phone number, date of birth) Demographic (age, height, weight, smoking history, relevant underlying medical conditions, etc.) Exposure (work, school, and commuting that increase risk of exposure to virus; contact with exposed individuals, etc.) Symptoms (symptoms, date of onset, testing, etc.) Internal CDC users will be authenticated by CDC's Active Directory system. Survey participants will be authenticated by NCEZID's RedCap survey system. Both systems are CDC authorized.

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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 study will use surveys to evaluate the association between serum PFAS concentrations and selected acute viral illnesses. It will collect the data described above either through paper-based surveys or online using an approved CDC system. These survey results will be linked to existing serum PFAS measures that were collected from previous ATSDR-funded studies using name and date of birth. Participant information will be used to contact survey participants, send reminders, confirm the identity of the participants and to ensure that the data from this study are correctly linked to the PFAS serum levels collected in a previous study. Participant information will not be shared outside of the purposes of this study. Demographic information and exposure information are needed as these represent potential confounders in the association between PFAS serum levels and viral infections. Symptom information is needed as this provides the main outcome data for this survey-based study. Study participants will be members of the public who have known exposures to PFAS. Identified data from this study will not be shared. Deidentified demographic, exposure, and symptom information will be disseminated through abstracts, professional meeting presentations and manuscripts for publication in peer reviewed journals.
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.	☐ 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 demographic info Exposure Other... Symptoms 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

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17	How many individuals' PII is in the system?	500-4,999
18	For what primary purpose is the PII used?	The primary purpose of the PII is for sending participants access to surveys (either through mailing or email addresses) and to link survey data to previously collected PFAS serum levels.
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	There is no secondary purpose for the PII in the system.
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.	ATSDR and NCEH are authorized to conduct this study under the 1980 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the 1986 Superfund Amendments and Reauthorization Act (SARA) (42 U.S.C. 9601, 9604), and the Public Health Service Act Section 301 (42 U.S.C. 241) and Section 311 (42 U.S.C. 243), respectively.
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: 09-19-0001 Records of Persons Exposed or Poten 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 pacakge is currently undergoing review.
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)).	Information from this study will not be shared. No information sharing agreements are in place or anticipated.
24c	Describe the procedures for accounting for disclosures	N/A
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.	Consent packages will be included with the recruitment level and will notify individuals that their information will be collected.
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.	Participants may opt-out by declining to participate in the study.
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 during a previous study.
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.	Individuals, who believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate, should contact the point of contact (POC) as identified in the sign-in sheet and consent form. They will be directed to identify the record and specify the information being contested, the corrective action sought, and the reasons for requesting the correction, along with supporting information to show how the record is inaccurate, incomplete, untimely, or irrelevant. The POC will make a determination as to the next steps that should be taken to address the individual's concerns. If an incident has occurred, the PI will report the potential incident to the Centers for Disease Control and Prevention (CDC) Security Incident Response Team and Privacy Officer.
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.	PII was collected during a previous ATSDR-funded study. Upon enrollment in this follow-up study, individuals will be able to correct any errors in PII.
31	Identify who will have access to the PII in the system and the reason why they require access.	☐ Users ☒ Administrators: Administrators will need to have access to PII in order to send links to ☐ 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.	Only ATSDR project staff will have access to PII during online data collection. PII will be deleted as soon as the online survey results are received.
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.	Study staff will complete CDC's annual security awareness training and sign associated rules of behavior.
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.

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36	Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	(•) Yes ( ) 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, 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.
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.

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

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	Reviewer Questions	Answer
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
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: 2021.06.03 12:30:35 -04'00'	HHS Senior Agency Official for Privacy	