

# Privacy Impact Assessment Form

v 1.21

Status  Form Number  Form Date

Question

Answer

1 OPDIV:

ATSDR

2 PIA Unique Identifier:

0923-13RT

2a Name:

ATSDR Exposure Investigation - Extension

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.

Implementation

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

8b Planned Date of Security Authorization

 Not Applicable

8c Briefly explain why security authorization is not required	This PIA is to assess the privacy risks associated with the subject data collection. The data collection does not have a dedicated IT system, however, it uses various authorized CDC IT systems for the processing, analysis, and storage of the data. Those systems have their own authorizations.											
9 Indicate the following reason(s) for updating this PIA. Choose from the following options.	<table border="0"><tr><td><input checked="" type="checkbox"/> PIA Validation (PIA Refresh/Annual Review)</td><td><input type="checkbox"/> Significant System Management Change</td></tr><tr><td><input type="checkbox"/> Anonymous to Non-Anonymous</td><td><input type="checkbox"/> Alteration in Character of Data</td></tr><tr><td><input type="checkbox"/> New Public Access</td><td><input type="checkbox"/> New Interagency Uses</td></tr><tr><td><input type="checkbox"/> Internal Flow or Collection</td><td><input type="checkbox"/> Conversion</td></tr><tr><td><input type="checkbox"/> Commercial Sources</td><td></td></tr></table> <p>OMB Generic Information Collection Request (ICR) extension</p>	<input checked="" type="checkbox"/> PIA Validation (PIA Refresh/Annual Review)	<input type="checkbox"/> Significant System Management Change	<input type="checkbox"/> Anonymous to Non-Anonymous	<input type="checkbox"/> Alteration in Character of Data	<input type="checkbox"/> New Public Access	<input type="checkbox"/> New Interagency Uses	<input type="checkbox"/> Internal Flow or Collection	<input type="checkbox"/> Conversion	<input type="checkbox"/> Commercial Sources		
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<input type="checkbox"/> Internal Flow or Collection	<input type="checkbox"/> Conversion											
<input type="checkbox"/> Commercial Sources												
10 Describe in further detail any changes to the system that have occurred since the last PIA.	No changes - Extension ICR											

11 Describe the purpose of the system.

The ATSDR Office of Community Health and Hazard Assessment (OCHHA) conducts public health assessments (PHAs) at sites when requested by the U.S. EPA, states, organizations, or individual petitioners following the Public Health Assessment Guidance Manual.

The purpose of the agency's PHA process is to find out whether a community has experienced environmental exposures of concern or is now being exposed to hazardous substances and, if so whether conditions warrant additional sampling and to decide if intervention is needed to minimize or eliminate exposure. The process also serves as a mechanism through which the agency responds to specific community health concerns related to hazardous waste sites.

ATSDR scientists review environmental data to see how much contamination is at a site, where it is, and how community residents might come into contact with it. Generally, ATSDR does not collect its own environmental sampling data but when adequate environmental or exposure information to assess human exposures and possible related health effects do not exist, ATSDR will perform an Exposure Investigation (EI).

The EI team conducts point of human-contact sampling focused on geographic areas where exposures are expected to be high. EIs may include environmental (e.g, soil, drinking water, sediment, food sources) or biological sampling (e.g., blood or urine), or both. An EI, using purposive convenience sampling, aims to identify the most highly exposed individuals and measure their exposure. The results of the investigation are site-specific and apply only to the participants from the site. An EI is not considered a health study or research, and any data gathered will thus not be disseminated as such. Furthermore, the EI is not designed to provide individual diagnoses, nor are participants' results intended to be generalized to other populations and other communities. No participants from external comparison groups are included in the data collection.

As a public service and incentive to participate, EIs provide individual exposure information back to the participants. The Science Support Branch (SSB) also coordinates and lends technical assistance to states, tribal, and territorial health departments that conduct their own EIs and to states included in the APPLETREE (ATSDR's Partnership to Promote Localized Efforts to Reduce Environmental Exposure ) Program which sponsors state-led non-research EIs.

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.)

Two primary types of information are collected during the EI process: collection of environmental and/or biological data and questionnaire data that will be used to better interpret the sampling results obtained during the EI.

The results of the questionnaire will be recorded electronically in the field and the data will be transferred to a secure ATSDR server. The questionnaire will include direct identifiers (e.g., name, address, phone), demographic information (e.g., gender, age, ethnicity, race), household information (e.g., age of home, time of residency) and occupational information (e.g., occupations that may be related to a particular contaminant). Consent forms will be signed by participants and the hard copy forms will be secured in a locked cabinet at ATSDR. Appropriate information will be shared with federal and state partners, as appropriate. Participants may be asked to consent to their information being shared with federal and state partners.

Users are authenticated to systems used in this information collection via CDC's Active Directory (AD) and PIV credentials. Users/system administrators include CDC employees and direct contractors (using HHS user credentials only).

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

Under this information collection, the EI will be completed using an approved protocol. All collections are voluntary for respondents. The information collected may include environmental and/or biological samples and questionnaire results, which will be used to interpret the sampling results.

PII information will be collected, including respondent's name, address, phone number and email address to allow ATSDR to provide respondents with their individual sampling results. PII information will be stored on a secure ATSDR server and access will be limited to ATSDR personnel on the EI team.

The information collected for the EI using the questionnaire may include information regarding demographic and residential history, household water use, occupational history, and age and activity patterns. Basic health status information (e.g., pregnancy status) may be obtained that will allow the sampling results to be assessed for each participant. The information collected will be used to better interpret the sampling results obtained during the EI.

The questionnaire will be administered in person to participants by ATSDR personnel. Questionnaire results will be recorded in the field on a secure ATSDR computer and transferred to a secured ATSDR server. Access to the server will be limited to ATSDR personnel on the EI team. Appropriate information will be shared with federal and state partners.

Participants will be asked to sign an adult consent form or a parental permission and/or assent form for children younger than 18 years old. The consent/parental permission/assent forms will include permission for ATSDR to share information with federal and state partners. Consent forms are hard copy and will be secured in a locked cabinet at ATSDR.

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

- Yes
- No

<p>15 Indicate the type of PII that the system will collect or maintain.</p>	<table border="0"> <tr> <td><input type="checkbox"/> Social Security Number</td> <td><input checked="" type="checkbox"/> Date of Birth</td> </tr> <tr> <td><input checked="" type="checkbox"/> Name</td> <td><input type="checkbox"/> Photographic Identifiers</td> </tr> <tr> <td><input type="checkbox"/> Driver's License Number</td> <td><input type="checkbox"/> Biometric Identifiers</td> </tr> <tr> <td><input type="checkbox"/> Mother's Maiden Name</td> <td><input type="checkbox"/> Vehicle Identifiers</td> </tr> <tr> <td><input checked="" type="checkbox"/> E-Mail Address</td> <td><input checked="" type="checkbox"/> Mailing Address</td> </tr> <tr> <td><input checked="" type="checkbox"/> Phone Numbers</td> <td><input type="checkbox"/> Medical Records Number</td> </tr> <tr> <td><input checked="" type="checkbox"/> Medical Notes</td> <td><input type="checkbox"/> Financial Account Info</td> </tr> <tr> <td><input type="checkbox"/> Certificates</td> <td><input type="checkbox"/> Legal Documents</td> </tr> <tr> <td><input type="checkbox"/> Education Records</td> <td><input type="checkbox"/> Device Identifiers</td> </tr> <tr> <td><input type="checkbox"/> Military Status</td> <td><input type="checkbox"/> Employment Status</td> </tr> <tr> <td><input type="checkbox"/> Foreign Activities</td> <td><input type="checkbox"/> Passport Number</td> </tr> <tr> <td><input type="checkbox"/> Taxpayer ID</td> <td><input type="text" value="Participant biological testing results"/></td> </tr> <tr> <td><input type="text" value="Participant environmental sampling results"/></td> <td><input type="text" value="Household and Demographic Information"/></td> </tr> <tr> <td><input type="text" value="Occupational Information"/></td> <td><input type="text" value="Other..."/></td> </tr> </table>	<input type="checkbox"/> Social Security Number	<input checked="" 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 checked="" 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="Participant biological testing results"/>	<input type="text" value="Participant environmental sampling results"/>	<input type="text" value="Household and Demographic Information"/>	<input type="text" value="Occupational Information"/>	<input type="text" value="Other..."/>
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<input checked="" type="checkbox"/> Medical Notes	<input type="checkbox"/> Financial Account Info																												
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<p>16 Indicate the categories of individuals about whom PII is collected, maintained or shared.</p>	<table border="0"> <tr> <td><input type="checkbox"/> Employees</td> </tr> <tr> <td><input checked="" type="checkbox"/> Public Citizens</td> </tr> <tr> <td><input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies)</td> </tr> <tr> <td><input type="checkbox"/> Vendors/Suppliers/Contractors</td> </tr> <tr> <td><input type="checkbox"/> Patients</td> </tr> <tr> <td>Other <input type="text" value=""/></td> </tr> </table>	<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" value=""/>																						
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<input type="checkbox"/> Patients																													
Other <input type="text" value=""/>																													
<p>17 How many individuals' PII is in the system?</p>	<input type="text" value="100-499"/>																												
<p>18 For what primary purpose is the PII used?</p>	<input type="text" value="The primary purpose for collecting the PII for EIs is to provide participants their individual sampling results."/>																												
<p>19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)</p>	<input type="text" value="There is no secondary use for the PII collected during the EI."/>																												
<p>20 Describe the function of the SSN.</p>	<input type="text" value="SSN will not be requested from participants"/>																												
<p>20a Cite the <b>legal authority</b> to use the SSN.</p>	<input type="text" value="Not applicable"/>																												
<p>21 Identify <b>legal authorities</b> governing information use and disclosure specific to the system and program.</p>	<input type="text" value="ATSDR is authorized under the 'Comprehensive Environmental Response, Compensation, and Liability Act of 1980' as amended by 'Superfund Amendments and Reauthorization Act of 1986' (42 U.S.C. 9601, 9604)."/>																												
<p>22 Are records on the system retrieved by one or more PII data elements?</p>	<input checked="" type="radio"/> Yes <input 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: 09-19-0001 Records of Persons Exposed or Potentially Exposed to Environmental Hazards

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.

OMB package in process; OMB Control No. 0923-0048 (Expiration Date: 03/31/2019)

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 Federal Agencies may assist with the Exposure Investigations. The
- State or Local Agency/Agencies State Agencies may assist with the Ex
- 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)).

A Memorandum of Understanding (MOU) providing a data use agreement for state and federal partners will be implemented, as needed.

<p>24c Describe the procedures for accounting for disclosures</p>	<p>As appropriate, PII will be shared with federal and state partners. For instance, state agencies may obtain blood lead results at a reportable level or EPA may obtain results to assist with their remedial efforts at a site. All disclosures will be recorded on an excel spreadsheet and will include the dataset, who the dataset was disclosed to, and for what purpose.</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>Participants will sign consent forms or parental permission forms/assent forms if participant is younger than 18 years old. The forms have a provision that will request permission from the participant to allow ATSDR to share their PII with federal and state partners, as appropriate.</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>In the consent forms and parental permission/assent forms, there is a provision for individuals to opt-out of the sharing of their PII with partners. However, collection of PII will be required to participate in the study so ATSDR can share results of the testing with participants. They may also opt out of the EI entirely by not responding, consenting, or by stated refusal.</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>If a major change to the information collection occurs (e.g., additional partners identified during the EI process that may need access to PII, change in use of the collected data), participants will be notified by phone, email and/or mail using information participants provided during the consent process. Participants will be asked to consent to the change in writing and the forms will be secured at ATSDR.</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 principal investigator will serve as the POC to resolve the individual's concerns. The individual should contact the principal investigator (contact information provided to the individual on the copy of the consent form given to them during the data collection).</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>For the EI, ATSDR personnel will determine whether the PII collected via consent/parental permission/assent forms and questionnaires are accurate. Participants will be provided ATSDR contact information to allow them to inform ATSDR if their contact information changes (e.g., if they move their residence or update a phone number). ATSDR will use the contact information to provide participants with biological testing results.</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 checked="" type="checkbox"/> Administrators <input type="checkbox"/> Developers <input checked="" type="checkbox"/> Contractors <input type="checkbox"/> Others</p>	<p>ATSDR personnel will have access to PII to provide participants with their test</p> <p>ATSDR administrators will be responsible for setting parameters</p> <p>ATSDR may use contractors for some EIs and contractors will have access to</p>



<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>The types of PII that can be accessed by EI team members will be limited to that needed to notify participants of their testing results. ATSDR administrators, primarily the NCEH/ATSDR Chief Data Scientist, will have access to PII as they set up and maintain permissions and access to the ATSDR server that will house the PII data for the EI. For each EI conducted within OCHHA, the principal investigator will comply with privacy requirements outlined in each EI, based on questions in the consent form that may allow ATSDR to share results with other public health agencies, etc. NCEH/ATSDR's Chief Data Scientist will monitor all PII requests and will advise on how to share data, based on the request for data sharing made in the consent forms.</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>ATSDR personnel will access PII data when they are recruiting participants and providing sampling results to participants. System managers will implement role based access controls on share drives such that only designated staff may access PII. All other staff may have access to de-identified data only.</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>All EA personnel handling PII will have completed appropriate privacy training and obtained a Scientific Ethics Verification (SEV) number.</p>	
<p>35 Describe training system users receive (above and beyond general security and privacy awareness training).</p>	<p>A Rules of Behavior document for EIs will be signed by the EI team and will be implemented at each site.</p>	
<p>36 Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>	
<p>37 Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.</p>	<p>Records are retained and disposed of in accordance with the ATSDR Comprehensive Records Control Schedule (B-371). Final EI reports are permanent records. Site files generated in support of the final report will be maintained in the Records and Information Management Branch and transferred to a Federal Records Center 5 years after the final report is published. Site records will be destroyed 30 years after the report is published. Disposal methods include the paper recycling process, burning or shredding hard copy records, and erasing computer files. Registry records will be actively maintained as long as funding is provided for by legislation.</p>	

38 Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Administrative Controls: ATSDR who maintain records are instructed in specific procedures to protect the security of records, and are to check with the system manager prior to making disclosure of data. When individually identified data are being used in a room, admittance is restricted to specifically authorized personnel. Appropriate Privacy Act provisions will be adhered to for the EI.

Technical Controls: Protection for computerized records on the ATSDR Network includes programmed verification of valid user identification code and password prior to logging on to the system, mandatory password changes, limited log-ins, virus protection, user rights/file attribute restrictions and use of encrypted files. Password protection imposes user name and password log-in requirements to prevent unauthorized access. Each user name is assigned limited access rights to files and directories at varying levels to control file sharing. There are routine daily backup procedures and secure off-site storage is available for backup files. Knowledge of passwords is required to access systems which are limited to users obtaining prior supervisory approval. When possible, a backup copy of data is stored at an offsite location and a log kept of all changes to each file and all persons reviewing the file. Selected safeguards will be applicable to specific elements of the system, as appropriate. Additional safeguards may also be built into the program by the system analyst as warranted by the sensitivity of the specific data set.

Physical Controls: Questionnaires, log books, and other source data are maintained in locked cabinets in locked rooms, and security guard service in buildings provide personnel screening of visitors. Access to facilities is controlled by a cardkey system. Access to computer rooms is controlled by a cardkey and security code (numeric keypad) system. Computer rooms are protected by an automatic sprinkler system, numerous automatic sensors (e.g., water, heat, smoke, etc.) are installed, and a proper mix of portable fire extinguishers is located throughout the computer room. The system is backed up on a nightly basis with copies of the files stored off site in a secure fireproof safe. Computer workstations, lockable personal computers, and automated records are located in secured areas.

**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

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