

# Privacy Impact Assessment Form

v 1.47.4

Status 

Form Number

Form Date

Question

Answer

1 OPDIV:

2 PIA Unique Identifier:

2a Name:

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.

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

11 Describe the purpose of the system.	The goal of the CureTB program is to ensure treatment completion, decrease of Tuberculosis (TB) transmission, and
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.)	Patient's name, address, phone/email, medical history, medical labs, medical reports, diagnoses, treatment are collected. Internal users will use PIV and Active directory (which has it's
13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	CureTB provides referrals and continuity of care services for TB patients and their families when traveling between the United States and other parts of the world. The program serves as an
14 Does the system collect, maintain, use or share PII?	<input checked="" type="radio"/> Yes <input type="radio"/> No
15 Indicate the type of PII that the system will collect or maintain.	<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 checked="" 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
16 Indicate the categories of individuals about whom PII is collected, maintained or shared.	<input type="checkbox"/> Employees <input type="checkbox"/> Public Citizens <input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies) <input type="checkbox"/> Vendors/Suppliers/Contractors <input checked="" type="checkbox"/> Patients Other <input type="text"/>
17 How many individuals' PII is in the system?	<input type="text" value="&lt;100"/>
18 For what primary purpose is the PII used?	For patient identification and to determine necessary treatment and to follow-up with patient to ensure treatment is completed
19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	N/A

20 Describe the function of the SSN.	N/A
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20a Cite the <b>legal authority</b> to use the SSN.	N/A
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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); Section 311, "General grant of authority for cooperation"(42 U.S.C. 243)
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22 Are records on the system retrieved by one or more PII data elements?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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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.	<p>Published: 09-20-0171: Quarantine- and Traveler-Related Activities, Including Records for Contact Tracing Investigation and Notification under 42</p> <p>Published: <input type="text"/></p> <p>Published: <input type="text"/></p> <p><input type="checkbox"/> In Progress</p>
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23 Identify the sources of PII in the system.	<p>Directly from an individual about whom the information pertains</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> In-Person</li> <li><input checked="" type="checkbox"/> Hard Copy: Mail/Fax</li> <li><input checked="" type="checkbox"/> Email</li> <li><input type="checkbox"/> Online</li> <li><input type="checkbox"/> Other</li> </ul> <p>Government Sources</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Within the OPDIV</li> <li><input type="checkbox"/> Other HHS OPDIV</li> <li><input checked="" type="checkbox"/> State/Local/Tribal</li> <li><input type="checkbox"/> Foreign</li> <li><input type="checkbox"/> Other Federal Entities</li> <li><input type="checkbox"/> Other</li> </ul> <p>Non-Government Sources</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Members of the Public</li> <li><input type="checkbox"/> Commercial Data Broker</li> <li><input type="checkbox"/> Public Media/Internet</li> <li><input type="checkbox"/> Private Sector</li> <li><input type="checkbox"/> Other</li> </ul>
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23a Identify the OMB information collection approval number and expiration date.	N/A
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24 Is the PII shared with other organizations?	<input type="radio"/> Yes <input type="radio"/> No
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24a Identify with whom the PII is shared or disclosed and for what purpose.

Within HHS

Other Federal Agency/Agencies

To accurately identify patient

State or Local Agency/Agencies

To accurately identify patient

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)).

The CureTB program has an MOU with the partners that provide input in the system.

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.

CDC does not collect the original data. PII and other personal information are collected by CDC partners and then CDC reaches out to the individuals to collect additional information.

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.

Individuals may decline to provide the requested PII's

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.

The consent for original uses is obtained during the initial PII collection by the CDC partners.

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.

This is handled by CDC external partners.

If there is a PII incident where an individual believes their data has been compromised or is inaccurate, they would contact the external partner. In the case of a discrepancy, the submitter must provide identification and be able to reasonably identify the record and specify the information being contested, the reasons for requesting the correction, and the corrective action sought along with supporting information to show how the record is inaccurate, incomplete, untimely, or irrelevant. The CDC Official will work with the CDC testing laboratory to investigate and resolve the data security issue or discrepancy. CDC would facilitate the resolution based on the individual's request and report back to the individual agency following a successful resolution so they may report back to the submitter.

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.	The program will put processes in place for program period reviews of PII contained in the system to ensure the data's completeness, integrity, availability, accuracy and relevancy.										
31	Identify who will have access to the PII in the system and the reason why they require access.	<table border="1"> <tr> <td data-bbox="721 222 954 359"><input checked="" type="checkbox"/> Users</td> <td data-bbox="954 222 1422 359">To perform their daily duties and responsibilities; such as conducting interviews accessing records to <del>determine what information is missing</del></td> </tr> <tr> <td data-bbox="721 359 954 495"><input checked="" type="checkbox"/> Administrators</td> <td data-bbox="954 359 1422 495">To perform their daily duties and responsibilities; such as conducting interviews accessing records to <del>determine what information is missing</del></td> </tr> <tr> <td data-bbox="721 495 954 632"><input checked="" type="checkbox"/> Developers</td> <td data-bbox="954 495 1422 632">Will have access to the system in order to develop and enhance the system that will allow the users to adequately <del>perform their duties. Developers may</del></td> </tr> <tr> <td data-bbox="721 632 954 768"><input checked="" type="checkbox"/> Contractors</td> <td data-bbox="954 632 1422 768">The CureTB group includes some Direct Contractors that will be users of the CureTB system. They will be <del>accessing the system to perform their</del></td> </tr> <tr> <td data-bbox="721 768 954 831"><input type="checkbox"/> Others</td> <td data-bbox="954 768 1422 831"></td> </tr> </table>	<input checked="" type="checkbox"/> Users	To perform their daily duties and responsibilities; such as conducting interviews accessing records to <del>determine what information is missing</del>	<input checked="" type="checkbox"/> Administrators	To perform their daily duties and responsibilities; such as conducting interviews accessing records to <del>determine what information is missing</del>	<input checked="" type="checkbox"/> Developers	Will have access to the system in order to develop and enhance the system that will allow the users to adequately <del>perform their duties. Developers may</del>	<input checked="" type="checkbox"/> Contractors	The CureTB group includes some Direct Contractors that will be users of the CureTB system. They will be <del>accessing the system to perform their</del>	<input type="checkbox"/> Others	
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32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The Role-based access (RBAC) will be used in the CureTB system. User identification process is through CDC Secure Access Management Services (SAMS). After a user is approved										
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 privileged model is utilized to allow those with access to PII to only access the minimum amount of information necessary to perform their job. CureTB predefined user groups and roles limit those with access to PII to only the minimum amount of information necessary to perform their job. Non-CDC users will only access their data based on their role.										
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.	Annual security and privacy awareness training is provided.										
35	Describe training system users receive (above and beyond general security and privacy awareness training).	CDC Role-based training. All system users will be 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?	<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.

Records will be retained and disposed of in accordance with the CDC Records Control Schedule. Records are retained for 20 years; for longer periods if further study is needed. CureTB system adheres to the CDC's Scientific and Research Project Records Control Schedule.

Routine reports are maintained for five years (GRS 5.2 item 20). Other input/output records are disposed of when no longer needed (GRS 5.2 item 20). Record copy of study reports are maintained in agency for ten years in accordance with retention schedules.

Source documents for computer are disposed of when no longer needed by program officials. Personal identifiers may be deleted from records when no longer needed in the study as determined by the system manager, and as provided in the signed consent form, as appropriate. Disposal methods include erasing computer tapes, burning or shredding paper materials or transferring records to the Federal Records Center when no longer needed for evaluation and analysis. Records are retained for 20 years; for longer periods if further study is needed.

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

Administrative Controls include Federal, HHS, and CDC specific Privacy, Risk Assessment, and Incident Management Policies, annual system privacy impact assessments; and mandatory annual security & privacy awareness training.

Technical Controls include the Data Entry module can only be accessed by CDC registered users that have CDC network access using a smartcard. External users will only be able to access the system via the Secured Access Management System (SAMS) where they go through a level III authentication. The system will be backed up on a nightly basis with copies of the files stored off site in a secure fireproof safe. All users must be registered to have access.

Physical Controls include access to the CDC Clifton Road facility where the mainframe computer is located is controlled by a cardkey system. The hard copy records are kept in locked cabinets in locked rooms. Access to the data entry center is only available to smartcard holders inside CDC facilities where there is also security guards.

General Comments

OPDIV Senior Official for Privacy Signature