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Privacy Impact Assessment Form

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	Question	Answer
1	OPDIV:	CDC
2	PIA Unique Identifier:	P-9346231-979130
2a	Name:	Communities Organized for the Prevention of Arboviruses (COPA)

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	Health Scientist
		POC Name	Stephen H (Steve) Waterman
		POC Organization	NCEZID/DB
		POC Email	shw2@cdc.gov
		POC Phone	787.706.2465

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	April 11, 2019 ☐ Not Applicable

11	Describe the purpose of the system.	The National Center for Emerging and Zoonotic Infectious Diseases (NCEZID)-Division of Vector Borne Diseases (DVBD) - Dengue Branch (DB) is developing the Communities Organized for the Prevention of Arboviruses (COPA) system to collect, manage and analyze data related to the knowledge, attitudes and practices of communities potentially hosting viral diseases transmitted to humans by infected mosquitoes i.e., Dengue, West Nile, chikungunya, Yellow Fever, and Zika and assist in the arboviral prevention and control. The objective of COPA is to collect data on what actions an individual will take once bitten by mosquitoes or demonstrate ability to recognize and eliminate breeding containers and educating residents about dengue mosquito and arboviral prevention and control by community residents.	
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.)	COPA data are entomological surveys conducted to measure response and action in population areas where mosquitoes could potentially transmit viral disease infections to humans i.e., Dengue, West Nile, Chikungunya, Yellow Fever, and Zika. Data will be collected from randomly selected households with individuals supplying information related to their mosquito bite prevention behaviors, whether or not they know about dengue, how it is spread, and if they can identify breeding sites. The system will collect Name, Date of Birth (DOB), Phone Numbers, E-mail/Physical Address, Global Positioning System (GPS) coordinates, and Dwelling type. The CDC Tablet-based EpiInfo survey tool requires users to authenticate using CDC/HHS credentials (Smart Card and userID and Password) to collect community data and to upload into the COPA servers. The user authentication process requires temporary storage based on technology for survey members.	

| 13 | Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily. | COPA is a Tablet-based EpiInfo survey tool, a statistical software for epidemiology developed by the CDC. The objective of COPA is to collect data on what actions an individual will take once bitten by mosquitoes or demonstrate ability to recognize and eliminate breeding containers and educating residents about dengue mosquito and arboviral prevention and control by community residents.

Data will be analyzed by Dengue Branch epidemiologists and study personnel. CDC Dengue Branch will be the steward/ owner of the data processed by this system. The data will be used by epidemiologists and study personnel to understand mosquito prevention behaviors in the community study and evaluate future interventions for the prevention of arboviral diseases.

Data will be collected from randomly selected households with individuals supplying information related to their mosquito bite prevention, whether or not they know about dengue, how it is spread, and if they can identify breeding sites. COPA Survey Teams will collect demographic information while demonstrating/showing resident(s) the potential for and/or existence of mosquito breeding environment where life threatening infectious diseases (Dengue/Zika/West Nile) could multiply beyond isolated location.   The system will collect from residents the Name, DOB, Phone Numbers, E-mail/ Physical Address, GPS coordination, and Dwelling type.

The CDC Tablet-based EpiInfo survey tool requires users to authenticate using CDC/HHS credentials (Smart Card and userID and Password) to collect community data and to upload into the COPA servers. The user authentication process requires temporary storage based on technology for survey members.

Many COPA support elements are Direct Contractors and have access to system through use CDC/HHS credentials. | |
| 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 ☒ Name ☐ Driver's License Number ☐ Mother's Maiden Name ☒ E-Mail Address ☒ Phone Numbers ☐ Medical Notes ☐ Certificates ☐ Education Records ☐ Military Status ☐ Foreign Activities ☐ Taxpayer ID	☒ Date of Birth ☐ Photographic Identifiers ☐ Biometric Identifiers ☐ Vehicle Identifiers ☒ Mailing Address ☐ Medical Records Number ☐ Financial Account Info ☐ Legal Documents ☐ Device Identifiers ☐ Employment Status ☐ Passport Number

GPS coordinates

Dwelling type

HHS User Credential Information

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?	100-499
18	For what primary purpose is the PII used?	General Public: PII collected from the public is used for analysis purposes related to mosquito mitigation behavior. The HHS user credentials are used to identify the CDC employee conducting the collection of data.
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	None
20	Describe the function of the SSN.	Not Applicable
20a	Cite the **legal authority** to use the SSN.	Not Applicable
21	Identify **legal authorities** 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)
22	Are records on the system retrieved by one or more PII data elements?	○ Yes ● No

		Directly from an individual about whom the information pertains	
23	Identify the sources of PII in the system.	☒ 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.	In Progress.	
24	Is the PII shared with other organizations?	○ Yes ◉ No	
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 requires non-governmental participants in the COPA survey to give consent with the research or public health event by capturing a certified electronic signature from each participant in the research protocol or study beforehand. Individuals participating in COPA survey grant their consent through the COPA Consent Form.	
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 choose not to participate by refusing to sign the consent form. Collection of employees Non-Sensitive Internal CDC Business Contact Information related contact information is for user identification with assigned responsibility in order to perform specific functions of their employment.	
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 information is collected using the Consent Forms. Any major changes would be explained in those forms thereby giving the appropriate notice.	

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.	The CDC's DVBD COPA surveys provide individuals with a Consent Form based on purpose of collected information. Consent Form lists Points of Contact for responding to an individual's concerns including any questions related to the accuracy of information collected. CDC will review concerns and respond to resolve inquiry of the individual.
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.	COPA Business and Technical Stewards conduct at a minimum annual reviews and periodic (monthly/quarterly) of all data, including PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy are maintained. The system administrator performs database monitoring and maintenance when new data is entered into the system or changes are requested by the users. Security controls are reviewed during the annual security self-assessments and recertification process.

31	Identify who will have access to the PII in the system and the reason why they require access.	☒ Users	Users (Investigators) collecting the PII and those performing analysis on the data where potential outbreak of Arboviruses.
		☒ Administrators	Oversee users and evaluate findings.
		☐ Developers	
		☐ Contractors	
		☐ Others	

32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	System Administrators in coordination with Business Steward will assign designated collection survey teams for read/write to data fields and Subject Matter Experts for role based
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.	Least privilege, Role Based Access methods are used to allow those with access to PII to only access the minimum amount of information necessary to perform their job. The system administrator is responsible for setting up the user access to the system based on the CDC user ID and the permissions assigned to it.
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 with significant security and privacy responsibilities are provided additional CDC and system specific Role-Based training.
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.	The records are maintained in accordance with General Records Schedule (GRS) and comply with CDC Records Control Schedule (RCS). Final reports are created to document programmatic decisions, policies, and other related issues and are maintained permanently (CDC RCS, B-321, 4-1). Input data of Non-electronic records manually data entered are maintained and disposed of when no longer needed. Other input/output records are disposed of when no longer needed: GRS 20.6 and CDC RCS, B-321, 4-1. 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.	
38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	Administrative controls: Completion of training requirements; risk analyses performed annually; branch management reviewing access requests and granting minimal amount of access. Technical controls: Users are authenticated and data secured using operating system and server security, administered by the local system administrator. PII data is encrypted at rest and in transits with access restricted to specific authorized users as required by HHS and CDC policy. Physical controls: Facility access controls; server protected in a guarded building.	
General Comments			
OPDIV Senior Official for Privacy Signature			