

# 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

<p>11 Describe the purpose of the system.</p>	<p>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.</p> <p>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.</p>	
<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>	<p>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.</p> <p>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.</p> <p>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.</p>	

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.

<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 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	

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?

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)

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

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.

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.

<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 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.</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>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.</p> <p>The system administrator performs database monitoring and maintenance when new data is entered into the system or changes are requested by the users.</p> <p>Security controls are reviewed during the annual security self-assessments and recertification process.</p>										
<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<table border="1"> <tr> <td data-bbox="732 684 951 814"> <input checked="" type="checkbox"/> Users             </td> <td data-bbox="956 684 1411 814">                 Users (Investigators) collecting the PII and those performing analysis on the data where potential outbreak of Arboviruses.             </td> </tr> <tr> <td data-bbox="732 821 951 884"> <input checked="" type="checkbox"/> Administrators             </td> <td data-bbox="956 821 1411 884">                 Oversee users and evaluate findings.             </td> </tr> <tr> <td data-bbox="732 890 951 953"> <input type="checkbox"/> Developers             </td> <td data-bbox="956 890 1411 953"> </td> </tr> <tr> <td data-bbox="732 959 951 1022"> <input type="checkbox"/> Contractors             </td> <td data-bbox="956 959 1411 1022"> </td> </tr> <tr> <td data-bbox="732 1029 951 1098"> <input type="checkbox"/> Others             </td> <td data-bbox="956 1029 1411 1098"> </td> </tr> </table>	<input checked="" type="checkbox"/> Users	Users (Investigators) collecting the PII and those performing analysis on the data where potential outbreak of Arboviruses.	<input checked="" type="checkbox"/> Administrators	Oversee users and evaluate findings.	<input type="checkbox"/> Developers		<input type="checkbox"/> Contractors		<input type="checkbox"/> Others	
<input checked="" type="checkbox"/> Users	Users (Investigators) collecting the PII and those performing analysis on the data where potential outbreak of Arboviruses.										
<input checked="" type="checkbox"/> Administrators	Oversee users and evaluate findings.										
<input type="checkbox"/> Developers											
<input type="checkbox"/> Contractors											
<input type="checkbox"/> Others											
<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>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</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>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.</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 CDC personnel are required to complete annual Security and Privacy Awareness Training.</p>										
<p>35 Describe training system users receive (above and beyond general security and privacy awareness training).</p>	<p>Users with significant security and privacy responsibilities are provided additional CDC and system specific Role-Based training.</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>										

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