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Privacy Impact Assessment Form

v 1.21

Status		Form Number		Form Date	

	Question	Answer
1	OPDIV:	CDC
2	PIA Unique Identifier:	0920-22CX
2a	Name:	Preferences for Longer-Acting Preexposure Prophylaxis (PrEP) M
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: COR POC Name: Dawn K. Smith POC Organization: CDC POC Email: dks0@cdc.gov POC Phone: 404-639-5166
7	Is this a new or existing system?	◉ New ○ Existing
8	Does the system have Security Authorization (SA)?	◉ Yes ○ No
8a	Date of Security Authorization	01/14/2022
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.	The Choice for PrEP (C4P) Study is a research study to understand how different features of HIV prevention services affect people's decisions to use PrEP, or pre-exposure prophylaxis, for HIV prevention. PrEP is medicine people can take to prevent getting HIV from sex or injection drug use. The study seeks to understand how access to new, long-acting PrEP products will affect people's decisions. The study will include about 1400 people.	
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.)	Information collected consist of; First name, Last name, Email, Phone number, Age – NOT date of birth, Address, State/County, Race, HIV status, Gender	
13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	Name, email, and telephone are used to contact possible respondents and provide information on the study and how to take part. Address is used if the respondent chooses to receive an incentive via US Mail. HIV status, race, gender, are used in data analysis. Respondents will answer questions through the Voxco Online software installed on secure servers in RTI Internationals Federal Information Processing Standards (FIPS) Moderate network to ensure secure data collection and programming support. Voxco is a commercial software product hosted at RTI in a CDC-approved network environment. Data passes through the Voxco interface directly into the FIPS Moderate environment and into a database specifically set up for the project. The database makes use of current Windows operating system software and a current commercial database software - SQL Server. The environment is maintained by RTI's Global Technology Solutions (GTS) and implements NIST 800-53 security controls at the FIPS Moderate level to ensure data is stored securely.	
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
Age - not birth date
Race | ☐ 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
Gender
HIV status
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 [ ]
17	How many individuals' PII is in the system?	500-4,999
18	For what primary purpose is the PII used?	Name, email, and telephone are used to contact possible respondents and provide information on the study and how to take part. Address is used if the respondent chooses to receive an incentive via US Mail. HIV status, race, gender, are used in data analysis.
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
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.	Public Health Service Act, Section 301, Research and Investigation, (42 U.S.C. 241); and Sections 304, 306 and 308(d) which discuss authority to maintain data and provide assurances of confidentiality for health research and related activities (42 U.S.C. 242 b, k, and m(d)).Information use and disclosure is governed under Departmental regulations, 5 USC 301.)
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: N/A Published: N/A Published: N/A ☒ 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.	

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 Purpose ☐ 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)).	N/A

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.	When respondents access the survey, they must read and acknowledge banners that explain the study and their rights as a respondent providing information. The information notes that "Participation in this study is completely voluntary. You may choose not to take part in the study or leave the study at any time without any consequences."

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.	Participation in this study is completely voluntary. The respondent may choose not to take part in the study or leave the study at any time without any consequences.	
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.	No process is in place because no changes are planned or are viable for the survey and no changes are planned or allowed by contract to the use of the data. No individual's PII will ever be used for a purpose materially different from that given at the time of collection.	
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 personally identifying information (e.g., name, email address) will be kept separate from answers to survey questions and can only be accessed by the research staff at RTI International. If a respondent has concerns about their PII, they can contact the Principal Investigator at RTI listed in the introductory material.	
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 data is reviewed initially on input to the survey by the Voxco software, which is programmed to detect out of range items and other anomalies. The data is then reviewed by data analysts to ensure that it is accurate, available, and relevant and that the integrity is protected within RTI's network. As the data is used over the course of the study, it is reviewed multiple times before final submission to CDC.	
31	Identify who will have access to the PII in the system and the reason why they require access.	☒ Users ☒ Administrators ☒ Developers ☐ Contractors ☐ Others	Data Analysts to review data and perform study related analysis. Have access to be able to carry out maintenance and updates of the To perform initial programming of survey questions and skip patterns
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	RTI institutes the National Institute of Standards and Technology (NIST) 800-53 Rev 4 controls, including the Personnel Security controls, to ensure that users are appropriately identified, undergo requisite background screening, and are cleared for the risk level and sensitivity level required for their roles. RTI personnel are identified at the project level by role, and only appropriate personnel with the requisite skills and knowledge are assigned to the project in the required role. System users and administrators are given access based on the principles of least privilege.	
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.	RTI project team members are assigned by skills needed on the project and are assigned access privileges through RTI's Global Technology Solutions (GTS) only the minimum access needed to carry out their assigned duties on the project.	

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.	RTI provides specific training for network users upon hire and annually thereafter. This training provides specific instruction on data security, insider threats, and preventing and reporting data security incidents.	
35	Describe training system users receive (above and beyond general security and privacy awareness training).	RTI project team members take CDC specific security awareness training annually when assigned to a CDC project.	
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 under RTI's Policy 1.9, RTI Records Retention Schedule, which provides for the retention and destruction of project records and also maintained under any contractual requirements that may supersede or supplement RTI's policy.	
38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	Administrative: Records are maintained according to specific records control schedules and policy as determined under the contract and by RTI. PII is secured administratively by role-based access that limits information visibility only to those authorized to see it. Technical: The PII is secured using Secure Socket Layer (SSL) during transmission and form authentication with role-based access specific to the authenticated user. Physical: Access to RTI servers is protected via multi-level key card and code access. Access to RTI physical campus is protected via key card and code access.	

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
Reviewer Notes		

Reviewer Questions	Answer
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		HHS Senior Agency Official for Privacy	