

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.	MuGSI is a surveillance initiative designed to evaluate the population-based incidence of carbapenem-nonsusceptibility
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.)	The system collects de-identified patient data (Date of Birth, Medical Notes, Gender, Race, Ethnicity and County and State of residence).
13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	MuGSI is a surveillance project designed to evaluate the population-based incidence of carbapenem-nonsusceptibility (antibiotic resistance) among common strains of bacteria.
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 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 type="checkbox"/> E-Mail Address <input type="checkbox"/> Mailing Address <input 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 Gender State County Race Ethnicity
16 Indicate the categories of individuals about whom PII is collected, maintained or shared.	<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 checked="" type="checkbox"/> Patients Other <input type="text"/>
17 How many individuals' PII is in the system?	500-4,999
18 For what primary purpose is the PII used?	PII is used to geographically and demographically locate the incident of disease and categorize it by impacted demographic groups.
19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	This information will be used for research purposes to better inform the public on how to prevent and/or treat these diseases.

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)).	
22 Are records on the system retrieved by one or more PII data elements?	<input type="radio"/> Yes <input checked="" type="radio"/> No	
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"><input type="checkbox"/> In-Person<input type="checkbox"/> Hard Copy: Mail/Fax<input type="checkbox"/> Email<input type="checkbox"/> Online<input type="checkbox"/> Other <p>Government Sources</p> <ul style="list-style-type: none"><input type="checkbox"/> Within the OPDIV<input type="checkbox"/> Other HHS OPDIV<input checked="" type="checkbox"/> State/Local/Tribal<input type="checkbox"/> Foreign<input type="checkbox"/> Other Federal Entities<input type="checkbox"/> Other <p>Non-Government Sources</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> Members of the Public<input type="checkbox"/> Commercial Data Broker<input type="checkbox"/> Public Media/Internet<input type="checkbox"/> Private Sector<input type="checkbox"/> Other	
23a Identify the OMB information collection approval number and expiration date.	0920-0978 12/17/2020	
24 Is the PII shared with other organizations?	<input checked="" type="radio"/> Yes <input type="radio"/> No	

<p>24a Identify with whom the PII is shared or disclosed and for what purpose.</p>	<p> <input type="checkbox"/> Within HHS <input type="checkbox"/> Other Federal Agency/Agencies <input checked="" type="checkbox"/> State or Local Agency/Agencies <input type="checkbox"/> Private Sector </p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>The information is shared among participating state health departments who supply data to MuGSI to understand, where, when and how antibiotic resistant related illnesses are occurring and to aid in prevention and treatment.</p> </div>
<p>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)).</p>	<div style="border: 1px solid black; padding: 5px;"> <p>N/A. No agreement other than CDC rules of behavior. State partners provide the data to the CDC, and the CDC shares it back to the participating states in the form of reports the state partners use for data analysis.</p> </div>
<p>24c Describe the procedures for accounting for disclosures</p>	<div style="border: 1px solid black; padding: 5px;"> <p>N/A. Not subject to Privacy Act</p> </div>
<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>	<div style="border: 1px solid black; padding: 5px;"> <p>Prior notice is not given to the individuals because the data is provided by the State and Local Health Departments, and any prior notice would be given by these entities. CDC collects this data whenever a case antibiotic resistant bacteria is reported by a partner health agency, as required.</p> </div>
<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>	<div style="border: 1px solid black; padding: 5px;"> <p>There is no option to object to the collection of the information. Local health regulations require these types of confirmed laboratory test results to be reported. The information collected by this system comes from State and Local Public Health departments whenever a case antibiotic resistant bacteria is reported by a partner health agency.</p> </div>
<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>	<div style="border: 1px solid black; padding: 5px;"> <p>If there were major changes to the system, it would not be possible to notify and obtain consent from the individuals whose PII is in the system, because the system does not collect any identifiable information that would allow CDC to contact them.</p> </div>
<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>	<div style="border: 1px solid black; padding: 5px;"> <p>There is not a redress process in place because of the nature of the data that the system maintains; there is no direct identifier or contact information collected. The individual can, however, contact the health facility where the PII was collected, and any redress rights would be exercised at the state and local levels where the information is collected.</p> </div>
<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>	<div style="border: 1px solid black; padding: 5px;"> <p>The PII will be reviewed by the Multi-Site Gram-Negative Bacilli Surveillance Initiative change management team using a view of the Emerging Infections Program Web Service (EWS) web service repository. EWS provides the PII data to the Multi-Site Gram-Negative Bacilli Surveillance Initiative. There is a Data Use Agreement between these two systems.</p> </div>

31	Identify who will have access to the PII in the system and the reason why they require access.	<input type="checkbox"/> Users	
		<input checked="" type="checkbox"/> Administrators	Administrators have access to PII for maintenance and support.
		<input checked="" type="checkbox"/> Developers	Direct contractors have access to PII for maintenance and support of the system like system upgrades and bug fixes.
		<input checked="" type="checkbox"/> Contractors	Direct contractors working as developers or system administrators have access to PII for maintenance and support of the system like system
		<input type="checkbox"/> Others	
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The Business Steward determines which system users access PII according to their need to administer or correct errors in the system and role based controls are established for these	
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>Least privilege methods are employed to ensure that those with access to PII can only access the minimum amount necessary to perform their job.</p> <p>Ways of creating least privilege include limiting specific users to only being able to read data, read and enter data, or give administrators full access to the database.</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.	All personnel annually receive security and privacy awareness training on an annual basis.	
35	Describe training system users receive (above and beyond general security and privacy awareness training).	System users also receive role based training.	
36	Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	<input type="radio"/> Yes <input checked="" 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 are retained and disposed of in accordance with the CDC Scientific and Research Project Retention Schedule N1-442-09-001. 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.	

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

Administrative controls include A data use agreement put in place between MuGSI and Emerging Infections Program Web Service Web Service to ensure correct use of information received. Additionally, both systems will be hosted within the CDC Application Hosting Branch and under the Standard operating procedures and security imposed by the CDC.

Technical controls include the implementation of encryption. Database security is used to allow the MuGSI application access to the repository to consume the information received by the web service.

Physical controls included security guards at gate to access facility, card key access and physical locks to data rooms.

General Comments

OPDIV Senior Official for Privacy Signature