


## Copy PIA (Privacy Impact Assessment)



Do you want to copy this PIA ?

Please select the user, who would be submitting the copied PIA.

## Instructions

Review the following steps to complete this questionnaire:

**1) Answer questions.** Select the appropriate answer to each question. Question specific help text may be available via the  icon. If your answer dictates an explanation, a required text box will become available for you to add further information.

**2) Add Comments.** You may add question specific comments or attach supporting evidence for your answers by clicking on the  icon next to each question. Once you have saved the comment, the icon will change to the  icon to show that a comment has been added.


**3) Change the Status.** You may keep the questionnaire in the "In Process" status until you are ready to submit it for review. When you have completed the assessment, change the Submission Status to "Submitted". This will route the assessment to the proper reviewer. Please note that all values list questions must be answered before submitting the questionnaire.

**4) Save/Exit the Questionnaire.** You may use any of the four buttons at the top and bottom of the screen to save or exit the questionnaire. The button allows you to complete the questionnaire. The button allows you to save your work and close the questionnaire. The button allows you to save your work and remain in the questionnaire. The button closes the questionnaire without saving your work.

## Acronyms

ATO - Authorization to Operate  
CAC - Common Access Card  
FISMA - Federal Information Security Management Act  
ISA - Information Sharing Agreement  
HHS - Department of Health and Human Services  
MOU - Memorandum of Understanding  
NARA - National Archives and Record Administration  
OMB - Office of Management and Budget  
PIA - Privacy Impact Assessment  
PII - Personally Identifiable Information  
POC - Point of Contact  
PTA - Privacy Threshold Assessment  
SORN - System of Records Notice  
SSN - Social Security Number  
URL - Uniform Resource Locator

## General Information

<b>PIA Name:</b>	CDC - NEPHTN - QTR1 - 2023 - CDC6707755	<b>PIA ID:</b>	6707755
<b>Name of Component:</b>	National Environmental Public Health Tracking Network	<b>Name of ATO Boundary:</b>	National Environmental Public Health Tracking Network
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>	POHL, Alan	<b># Days Open:</b>	16
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	3/22/2023
<b>Next Assessment Date:</b>	N/A	<b>Expiration Date:</b>	
<b>Office:</b>	DDNID	<b>OpDiv:</b>	CDC
<b>Security Categorization:</b>	Moderate		
<b>Legacy PIA ID:</b>		<b>Make PIA available to Public?:</b>	Yes
		<b>History Log:</b>	<a href="#">View History Log</a>
<b>1:</b>	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance	
<b>2:</b>	Is this a FISMA-Reportable system?	Yes	
<b>3:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes	
<b>4:</b>	ATO Date or Planned ATO Date	3/31/2023	

## PTA

### PTA

<b>PTA - 2:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.	New Public Access
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	1) The Secure Access Management System (SAMS) Distributed Processing System (DPS) has been changed to SAMS Secure Data Exchange (SDX) for data submission. 2) National Environmental Public Health Tracking Network (NEPHTN) now uses REDCap for additional data collection.
<b>PTA - 3:</b>	Is the data contained in the system owned by the agency or contractor?	Agency

**PTA - 4:**

Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions.

National Environmental Public Health Tracking Network (NEPHTN) is a web-based Analysis Information System that provides a “one-stop” resource for identifying data specifically related to understanding environmental-health interactions. NEPHTN supplements and leverages the work others have done to add to and enhance the knowledge base of environmental contributions to health outcomes. NEPHTN provides the means to identify, access, and organize hazard, exposure, and health data from these various sources. Topics for NEPHTN analysis include: Air Quality, Asthma, Birth Defects, Cancer, Carbon Monoxide Poisoning, Childhood Lead Poisoning, Climate Change, Pesticides, Water Systems and Heart Attacks. NEPHTN also includes data from external users, such as state and local health departments as well as data from federal agencies; including the U.S. Environmental Protection Agency (EPA), National Aeronautics and Space Administration (NASA) and U.S. Census Bureau. NEPHTN also hosts the Agency for Toxic Substance and Disease Registry (ATSDR) Request Management Service System (ARMSS). This subsystem is a web-based tracking and reporting system to record the majority of requests that ATSDR is responsible for.

NEPHTN uses state and national provided data sets to display various data on the Secure and Public Portal. NEPHTN utilizes the CDC Secure Access Management System (SAMS)’s SDX (Secure Data Exchange) to allow NEPHTN grantees the ability to submit data to the Tracking Network. This data goes through additional manual processing before it is utilized on the Secure and Public Portal. NEPHTN allows users to interact with data via two separate components (Secure and Public Portal) to process the information within the system in different ways. The design of the Secure and Public Portal is similar but separate in roles and access rights. It’s important to note that the components of the Secure Portal are deployed separately from the components of the Public Portal, but the functionality provided in both environments is similar.

**PTA - 5:**

List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.

NEPHTN is a portal for collecting and sharing electronic health and environmental data. NEPHTN also uses state and national provided data sets to display various data on the Secure and Public Portal. Names and business email addresses are stored in the system.

Tracking collects and stores aggregated data at State, County and Census Tract Level such as: Population Health (Populations and Vulnerabilities - Number/Percent of population aged 5 with disabilities, Health Impact Assessment - Estimated number of all-cause deaths avoided, Lifestyle Risk Factors - Percent of current, former and smoked).

Health Effects (Asthma - Number and Crude Rate of Hospitalizations and Emergency Department visits (ED Visits), Birth Defects - Average annual number of cases over 5 year period, Developmental Disabilities - Estimated prevalence of autism spectrum disorder, Childhood Lead Poisoning - Number/percent of children tested, Cancer - Annual number of cases )

Environment (Air Quality - Number of days above regulatory standard, Drinking Water - Number of water systems by concentration by chemical, Sunlight & Ultraviolet - Annual and Monthly average sunlight exposure)

Hazards (Toxic Substance Releases - Number/Percent of reported acute toxic substance releases, Pesticide Exposures - Number of minor effect illnesses from exposures)

In addition to the collection of health and environmental data, NEPHTN also collects information for product feedback and also from our recipients for program evaluation and monitoring using REDCap (Research Electronic Data Capture-Component). We collect the recipient's workplan, program accomplishments - public health actions (PHA), performance measures, PHA impact follow up, communication plan and web stats through REDCap.

ARMSS will collect information regarding the request such as location, site, request type, request medium, what type of work is requested, number of people affected, contaminants, public health impact rating, exposure rating, what status the request is in, what products or services will be developed for that request, and the lifecycle stage those products or services are in.

Examples of data include:

Request (Request Type, Received Type, Requested Activity, Request Date, Name, Primary Concern)

Scoping (Scoping Date, Thirty Day Milestone, Exposure Rating, Public Health Impact Rating, Prioritization, Primary Contaminant)

Triage (Evidence of Exposure, Is Data Sufficient, Data Receive Date, Fifteen Day Milestone, Decision Review Date, Referred to Agency, Acknowledgment Letter Sent Date)

Activity (Coop Program, Activity Name, Planned Start Date, Notes, Status, Start Date, Complete SDX Date)

Site (Name, Description, EPA Facility Identification, Superfund Number, National Priorities List Code Identification, Federal Facility Identification, Address)

**PTA - 5A:** Are user credentials used to access the system?

**PTA - 5B:** Please identify the type of user credentials used to access the system.

**PTA - 6:** Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual.

NEPHTN is a portal for collecting and sharing electronic health and environmental data. NEPHTN also uses state and national provided data sets to display various data on the Secure and Public Portal. Names and business email addresses are stored in the system.

Tracking collects and stores aggregated data at State, County and Census Tract Level such as: Population Health (Populations and Vulnerabilities - Number/Percent of population aged 5 with disabilities, Health Impact Assessment - Estimated number of all-cause deaths avoided, Lifestyle Risk Factors - Percent of current, former and smoked).

Health Effects (Asthma - Number and Crude Rate of Hospitalizations and ED visits, Birth Defects - Average annual number of cases over 5 year period, Developmental Disabilities - Estimated prevalence of autism spectrum disorder, Childhood Lead Poisoning - Number/percent of children tested, Cancer - Annual number of cases )

Environment (Air Quality - Number of days above regulatory standard, Drinking Water - Number of water systems by concentration by chemical, Sunlight & Ultraviolet - Annual and Monthly average sunlight exposure)

Hazards (Toxic Substance Releases - Number/Percent of reported acute toxic substance releases, Pesticide Exposures - Number of minor effect illnesses from exposures)

In addition to the collection of health and environmental data, EPHTN also collects information for product feedback and also from our recipients for program evaluation and monitoring using REDCap (Research Electronic Data Capture). We collect the recipient's workplan, program accomplishments - public health actions (PHA), performance measures, PHA impact follow up, communication plan and web stats through REDCap.

ARMSS will collect information regarding the request such as location, site, request type, request medium, what type of work is requested, number of people affected, contaminants, public health impact rating, exposure rating, what status the request is in, what products or services will be developed for that request, and the lifecycle stage those products or services are in.

Examples of data include:  
Request (Request Type, Received Type, Requested Activity, Request Date, Name,

		Primary Concern)
		Scoping (Scoping Date, Thirty Day Milestone, Exposure Rating, Public Health Impact Rating, Prioritization, Primary Contaminant)
		Triage (Evidence of Exposure, Is Data Sufficient, Data Receive Date, Fifteen Day Milestone, Decision Review Date, Referred to Agency, Acknowledgment Letter Sent Date)
		Activity (Coop Program, Activity Name, Planned Start Date, Notes, Status, Start Date, Complete SDX Date)
		Site (Name, Description, Environmental Protection Agency (EPA) Facility Identification Number (ID), Central Registry (CR) Number, Superfund Number NPL Code ID, Federal Facility ID, Address)
<b>PTA - 7:</b>	Does the system collect, maintain, use or share PII?	Yes
<b>PTA - 7A:</b>	Does this include Sensitive PII as defined by HHS?	Yes
<b>PTA - 8:</b>	Does the system include a website or online application?	Yes
<b>PTA - 8A:</b>	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	Yes
<b>PTA - 9:</b>	Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response.	<p><a href="https://ephracking.cdc.gov">https://ephracking.cdc.gov</a> (PUBLIC PORTAL) This is the URL used by external users that uses SAMS for user authentication.</p> <p><a href="https://ephtsecure.cdc.gov">https://ephtsecure.cdc.gov</a> (SECURE PORTAL) This is the URL used by internal users that uses AD for authentication.</p> <p><a href="https://ephtsecure.cdc.gov/MetadataCreationTool/creatorDashboard">https://ephtsecure.cdc.gov/MetadataCreationTool/creatorDashboard</a> (Metadata Creation Tool)</p>
<b>PTA - 10:</b>	Does the website have a posted privacy notice?	Yes
<b>PTA - 11:</b>	Does the website contain links to non-federal government websites external to HHS?	No
<b>PTA - 11A:</b>	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
<b>PTA - 12:</b>	Does the website use web measurement and customization technology?	No
<b>PTA - 12A:</b>	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	
<b>PTA - 13:</b>	Does the website have any information or pages directed at children under the age of thirteen?	No
<b>PTA - 13A:</b>	Does the website collect PII from children under the age thirteen?	No
<b>PTA - 13B:</b>	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
<b>PTA - 14:</b>	Does the system have a mobile application?	No
<b>PTA - 14A:</b>	Is the mobile application HHS developed and managed or a third-party application?	

<b>PTA - 15:</b>	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
<b>PTA - 16:</b>	Does the mobile application/ have a privacy notice?	
<b>PTA - 17:</b>	Does the mobile application contain links to non-federal government website external to HHS?	
<b>PTA - 17A:</b>	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
<b>PTA - 18:</b>	Does the mobile application use measurement and customization technology?	
<b>PTA - 18A:</b>	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
<b>PTA - 19:</b>	Does the mobile application have any information or pages directed at children under the age of thirteen?	
<b>PTA - 19A:</b>	Does the mobile application collect PII from children under the age thirteen?	
<b>PTA - 19B:</b>	Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
<b>PTA - 20:</b>	Is there a third-party website or application (TPWA) associated with the system?	No
<b>PTA - 21:</b>	Does this system use artificial intelligence (AI) tools or technologies?	No

**PIA**

**PIA**

<b>PIA - 1:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Business Partners/Contacts (Federal, state, local agencies)
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	201 - 500
<b>PIA - 4:</b>	For what primary purpose is the PII used?	We contact the individuals if we have issues with their data submissions or to provide status of events.
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	NA
<b>PIA - 6:</b>	Describe the function of the SSN and/or Taxpayer ID.	NA
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN.	NA
<b>PIA - 7:</b>	Identify legal authorities, governing information use and disclosure specific to the system and program.	5 USC, Section 301
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	No
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	
<b>PIA - 8B:</b>	Provide the number, title, and URL of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or indicate whether a new or revised SORN is in development.	

<b>PIA - 9:</b>	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains  Online  Government Sources  State/Local/Tribal
<b>PIA - 10:</b>	Is there an Office of Management and Budget (OMB) information collection approval number?	No
<b>PIA - 10A:</b>	Provide the information collection approval number.	
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	
<b>PIA - 10C:</b>	Explain why an OMB information collection approval number is not required.	Only Name and Email Address is used, which is collected from SAMS. CDC only uses the email address to contact the recipient if there is any issues with their data submission.
<b>PIA - 11:</b>	Is the PII shared with other organizations outside the system's Operating Division?	No
<b>PIA - 11A:</b>	Identify with whom the PII is shared or disclosed.	
<b>PIA - 11B:</b>	Please provide the purpose(s) for the disclosures described in PIA - 11A.	
<b>PIA - 11C:</b>	List any agreements in place that authorize the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	
<b>PIA - 11D:</b>	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII. If no process or procedures are in place, please explain why not.	
<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
<b>PIA - 12A:</b>	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
<b>PIA - 13:</b>	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.	This is the same information that is required when they request a SAMS user account. There is no opt-out as this email address serves as a contact for the data submission. This email could however be substituted with a generic contact email for the data submitter. If the individual does not want to share his or her business data, then they will not be able to access this system.
<b>PIA - 14:</b>	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.	When major changes occur to the system individuals will be notified by email to obtain their consent.
<b>PIA - 15:</b>	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.	In the event that individuals feel their PII was obtained inappropriately, or is inaccurate they should email the Tracking Support mailbox at <a href="mailto:trackingsupport@cdc.gov">trackingsupport@cdc.gov</a> . Once the request is received, research will be conducted and communicated back to the originating party.



<b>PIA - 16:</b>	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy. Please address each element in your response. If no processes are in place, explain why not.	Once a year there will be a check of the SAMS database and then purge any names and emails that are no longer active.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Administrators Developers Contractors
<b>PIA - 17A:</b>	Select the type of contractor.	HHS/OpDiv Direct Contractors
<b>PIA - 17B:</b>	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
<b>PIA - 18:</b>	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Administrators - May need this information to contact the data submitter in regards to an issue.  Developers - PII Information is in the database, and developers will need access to the database.  Contractors - CDC direct contractors may need this information to contact the data submitter in regards to an issue.
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The system uses role-based access controls to ensure administrators and direct contractors are granted access on a "need-to-know" and "need-to-access" commensurate with their assigned duties.
<b>PIA - 20:</b>	Describe the technical methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.	Only System Administrators have access to the PII in the system. They create new system users, grant user access and disable accounts. Therefore they have access to all PII in the system.
<b>PIA - 21:</b>	Identify the general security and privacy awareness training provided to system users (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 system users must complete annual Security and Privacy Awareness and Training (SAT)
<b>PIA - 22:</b>	Describe training system users receive (above and beyond general security and privacy awareness training).	None
<b>PIA - 23:</b>	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).	The names and email addresses are based on a CDC SAMS account. Once per year we validate that the SAMS account is still valid and if so we continue to maintain the PII. If the SAMS account no longer exists or is disabled the corresponding PII is deleted from NEPHTN.  Per our record management schedule GRS 5.2, item 020 we dispose when no longer needed. 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 treatment.

<b>PIA - 24:</b>	Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.	<p>Administrative: Records are maintained according with CDC's record control schedule and record control policy. The PII is secured using the CDC/IS Active Directory authentication process and role based application control via RBAC.</p> <p>Technical: Monitored by the Network and IT security controls which is administered by Cyber Security Program Office. In addition, the image documentation containing PII will be encrypted.</p> <p>Physical: Controls are managed by security guards, ID badges, locked doors, and key card restrictions.</p>
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**Review & Comments**

<b>Privacy Analyst Review</b>			
<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	3/27/2023
<b>Privacy Analyst Comments:</b>		<b>Privacy Analyst Days Open:</b>	

<b>SOP Review</b>			
<b>SOP Review Status:</b>	Approved	<b>SOP Signature:</b>	JWO Signature.docx
<b>SOP Comments:</b>		<b>SOP Review Date:</b>	3/28/2023
		<b>SOP Days Open:</b>	6

<b>Agency Privacy Analyst Review</b>			
<b>Agency Privacy Analyst Review Status:</b>		<b>Agency Privacy Analyst Review Date:</b>	4/6/2023
<b>Agency Privacy Analyst Review Comments:</b>		<b>Agency Privacy Analyst Days Open:</b>	9

<b>SAOP Review</b>			
<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	
<b>SAOP Comments:</b>		<b>SAOP Review Date:</b>	4/6/2023
		<b>SAOP Days Open:</b>	

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

### Comments

Question Name	Submitter	Date	Comment	Attachment
No Records Found				