

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.	The National Intimate Partner and Sexual Violence Survey (NISVS) information system collects information about
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 data elements the system will be collecting on participants include demographics such as age, gender, race, ethnicity, and marital status. It also includes personal identifiable information (PII) such as name, address, email, & phone
13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	The NISVS information system will collect and store information into a centralized data collection system. Potential Study Participants will complete a Screener to determine
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 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 Race and Ethnicity Age User Credentials Marital status PINs
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 checked="" type="checkbox"/> Vendors/Suppliers/Contractors <input 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?	For the Study Participants, name and address are collected to distribute incentives; phone and email address collected if survey to be completed over the phone; and demographics are collected for study analysis. For Indirect contractor personnel, name and email address is collected to assign the user credentials.

19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	PII will not be used for any secondary purposes.	
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).	
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> <p><input checked="" type="checkbox"/> In-Person</p> <p><input checked="" type="checkbox"/> Hard Copy: Mail/Fax</p> <p><input checked="" type="checkbox"/> Email</p> <p><input checked="" type="checkbox"/> Online</p> <p><input type="checkbox"/> Other</p> <p>Government Sources</p> <p><input type="checkbox"/> Within the OPDIV</p> <p><input type="checkbox"/> Other HHS OPDIV</p> <p><input type="checkbox"/> State/Local/Tribal</p> <p><input type="checkbox"/> Foreign</p> <p><input type="checkbox"/> Other Federal Entities</p> <p><input type="checkbox"/> Other</p> <p>Non-Government Sources</p> <p><input type="checkbox"/> Members of the Public</p> <p><input type="checkbox"/> Commercial Data Broker</p> <p><input type="checkbox"/> Public Media/Internet</p> <p><input type="checkbox"/> Private Sector</p> <p><input type="checkbox"/> Other</p>	
23a Identify the OMB information collection approval number and expiration date.	No number yet, TBD.	
24 Is the PII shared with other organizations?	<input type="radio"/> Yes <input checked="" type="radio"/> 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.	Study Participants are notified through the consenting process. Indirect contractor personnel are notified when assigned to the project if they have access to the management system.	
26 Is the submission of PII by individuals voluntary or mandatory?	<input checked="" type="radio"/> Voluntary <input type="radio"/> 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.	During the survey, Study Participants may opt-out of providing their PII. Indirect contractor personnel cannot perform their role in support of the study and accessing the system, if they choose to opt-out.	

<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>	<p>Study personnel will contact participants via email and phone number on record to notify and obtain consent when major changes occur to the system.</p>										
<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>For Study Participants, the consenting process will provide the information necessary if there are concerns about their PII. Participants may contact Project Manager, Terry Green at terrygreen@westat.com. Contractor personnel may contact their supervisor if issues arise or the Project Manager, Terry Green at terrygreen@westat.com.</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>Study Participant data will be reviewed quarterly to ensure the data's accuracy, integrity, and relevancy. In-direct contractor personnel data will also be reviewed quarterly to ensure their system access is accurate and relevant.</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="732 686 951 751"> <input type="checkbox"/> Users </td> <td data-bbox="956 686 1411 751"></td> </tr> <tr> <td data-bbox="732 758 951 873"> <input checked="" type="checkbox"/> Administrators </td> <td data-bbox="956 758 1411 873"> <p>Administrators need access to administer and to provide systems support.</p> </td> </tr> <tr> <td data-bbox="732 879 951 1010"> <input checked="" type="checkbox"/> Developers </td> <td data-bbox="956 879 1411 1010"> <p>Developers have access to the Production site for systems support (deployment of new site releases, extraction and delivery of data,</p> </td> </tr> <tr> <td data-bbox="732 1016 951 1100"> <input checked="" type="checkbox"/> Contractors </td> <td data-bbox="956 1016 1411 1100"> <p>In-direct contractors require access to collect and assess the data.</p> </td> </tr> <tr> <td data-bbox="732 1106 951 1171"> <input type="checkbox"/> Others </td> <td data-bbox="956 1106 1411 1171"></td> </tr> </table>	<input type="checkbox"/> Users		<input checked="" type="checkbox"/> Administrators	<p>Administrators need access to administer and to provide systems support.</p>	<input checked="" type="checkbox"/> Developers	<p>Developers have access to the Production site for systems support (deployment of new site releases, extraction and delivery of data,</p>	<input checked="" type="checkbox"/> Contractors	<p>In-direct contractors require access to collect and assess the data.</p>	<input type="checkbox"/> Others	
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<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>Administrators and Developers granted access to data is based on the roles of users as authorized by the project manager and the information system manager. Granulated rights at both</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>Role based access control are in place to ensure the concept of "least privilege" is implemented. Job function determines the level of access and users are assigned only those rights necessary to fulfill responsibilities for approved roles. System-level audit controls safeguard and audit use.</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>Privacy and Security awareness training is provided at on-boarding; Human Subjects Protection training provided to all personnel using the system. Refresher training in both Privacy and Security and Human Subjects Protection is provided on an annual basis.</p>										
<p>35 Describe training system users receive (above and beyond general security and privacy awareness training).</p>	<p>Additional training for data collection, the use of data in analyses, and other task-specific training is provided as needed.</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.	Records are retained and disposed of in accordance with the CDC Records Control Schedule (N1-442-09-1) and in accordance with contractual agreement. Record copy of study reports are maintained in the agency from two to three years in accordance with retention schedules. Source documents for computer are disposed of when they are no longer needed by program officials. 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. Records are retained for 20 years; for longer periods if further study is needed.	
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 system security plan, contingency plan, regular back up of files and storage of backups off site, role-based security awareness training, least privilege access enforced through Active Directory groups, separate user and privileged accounts for administrators, policies and procedures in place for retention and destruction of PII, and a corporate incident response team and incident response plans. Technical controls include identification and authentication using unique user IDs, passwords, and smart cards, use of firewalls and intrusion detection/prevention systems, virus scanning software on all computers, and a security information and event management (SIEM) solution. Physical controls include guards, identification badges, key cards, and closed circuit TV.	
39 Identify the publicly-available URL:	HEALTHSAFETYSTUDY.ORG	
40 Does the website have a posted privacy notice?	<input checked="" type="radio"/> Yes <input type="radio"/> No	
40a Is the privacy policy available in a machine-readable format?	<input checked="" type="radio"/> Yes <input type="radio"/> No	
41 Does the website use web measurement and customization technology?	<input checked="" type="radio"/> Yes <input type="radio"/> No	

41a Select the type of website measurement and customization technologies is in use and if it is used to collect PII. (Select all that apply)

Technologies	Collects PII?
<input type="checkbox"/> Web beacons	<input type="radio"/> Yes <input type="radio"/> No
<input type="checkbox"/> Web bugs	<input type="radio"/> Yes <input type="radio"/> No
<input checked="" type="checkbox"/> Session Cookies	<input type="radio"/> Yes <input checked="" type="radio"/> No
<input type="checkbox"/> Persistent Cookies	<input type="radio"/> Yes <input type="radio"/> No
Other... <input type="text"/>	<input type="radio"/> Yes <input type="radio"/> No

42 Does the website have any information or pages directed at children under the age of thirteen? Yes No

43 Does the website contain links to non- federal government websites external to HHS? Yes No

General Comments

OPDIV Senior Official for Privacy Signature