

# Privacy Impact Assessment Form

v 1.21

Status  Form Number  Form Date

Question

Answer

1 OPDIV:

CDC

2 PIA Unique Identifier:

0920-2131

2a Name:

Capacity Building Assistance Program: Data Management, Mon

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.

Operations and Maintenance

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

8a Date of Security Authorization

N/A

<p>9 Indicate the following reason(s) for updating this PIA. Choose from the following options.</p>	<p><input checked="" type="checkbox"/> PIA Validation (PIA Refresh/Annual Review) <input type="checkbox"/> Significant System Management Change <input type="checkbox"/> Anonymous to Non-Anonymous <input type="checkbox"/> Alteration in Character of Data <input type="checkbox"/> New Public Access <input type="checkbox"/> New Interagency Uses <input type="checkbox"/> Internal Flow or Collection <input type="checkbox"/> Conversion <input type="checkbox"/> Commercial Sources</p> <p>Other...</p>
<p>10 Describe in further detail any changes to the system that have occurred since the last PIA.</p>	<p>Not applicable</p>
<p>11 Describe the purpose of the system.</p>	<p>The purpose of this information collection is to evaluate the CDC cooperative agreement program entitled CDC-RFA-PS19-1904: Capacity Building Assistance (CBA) for High Impact HIV Prevention Program Integration.</p> <p>Specifically, this information collection will assess how well the Division of HIV Prevention (DHP)'s CBA program meets the capacity building needs of programs directly and indirectly funded by CDC to provide HIV prevention services</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>The system will collect, maintain/store, and share (between the government and contractors) training and technical assistance (TA) recipients': (1) demographic details, (2) business contact information, (3) post-training survey responses, and (4) post-TA survey responses.</p> <p>The 25 questions on the Learning Group Registration Form collects demographic information about training recipients' including: 1) business contact information (e.g., business email and telephone number); 2) primary [employment] functional role; 3) employment setting; and 4) programmatic and population areas of focus. The CDC TRAIN system will store the information for use during future training registrations.</p> <p>The demographic and identifiable data are needed to complete registration, disseminate the Post-Training Evaluation, and conduct follow-up with program managers. The identifiable data from the Learning Group Registration is entered, stored, and transmitted in a separate database from all the other data collected.</p>

13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

There are two systems involved in the collection of training and TA data. The first system is CDC TRAIN. CDC TRAIN is an existing online learning management system that is primarily used to deliver eLearning courses. CDC TRAIN also allows individuals to register for in-person (face-to-face) trainings. This project uses CDC TRAIN to collect demographic information for training recipients. CDC TRAIN data access is granted to a small number of designated DHP, Capacity Development Branch (CDB) and Translation and Evaluation (TEB) staff, CBA providers, and the TEB evaluation contractors.

The second system used by this project is the CBA Tracking System (CTS). CTS is an existing system customized for this project. CTS offers survey capabilities beyond the options in CDC TRAIN. Specifically, CTS collects information beyond demographics such as the post-training and post-TA surveys. CTS is a password protected online application with varying levels of data access granted to DHP CDB and TEB staff, CDC-funded CBA providers, and the TEB evaluation contractors.

CDC TRAIN only administers the Learning Group Registration Form. CTS administers the Post-Training Evaluation, Post-TA Evaluation, and the Training and Technical Assistance Follow-up Survey.

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 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	<input type="text" value="Business street address"/>
<input type="text" value="Business phone number"/>	<input type="text" value="Other..."/>
<input type="text" value="Business email address"/>	<input type="text" value="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?	The business email address will allow the system to send individuals an email invitation to complete the web-based version of the post-training survey or post-TA survey. The business phone number is used to contact individuals if they do not respond to the email invitation. Name and other business contact information is used to verify that the person contacted by phone is the correct individual.
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	Business contact information is also used during data cleaning to remove duplicate records before conducting analysis related to program evaluation.
20	Describe the function of the SSN.	Not applicable.
20a	Cite the <b>legal authority</b> to use the SSN.	Not applicable.
21	Identify <b>legal authorities</b> 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 checked="" type="radio"/> Yes <input type="radio"/> 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: 09-20-0161 Records of Health Professionals in Di Published: <input type="text"/> Published: <input type="text"/> <input type="checkbox"/> In Progress

<p>23 Identify the sources of PII in the system.</p>	<p>Directly from an individual about whom the information pertains</p> <p><input type="checkbox"/> In-Person</p> <p><input type="checkbox"/> Hard Copy: Mail/Fax</p> <p><input 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 checked="" type="checkbox"/> Other</p>
<p>23a Identify the OMB information collection approval number and expiration date.</p>	<p>0920-1322 and 2/29/24. This current extension request will update the expiration date once OMB approves it.</p>
<p>24 Is the PII shared with other organizations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<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>	<p>Participants are notified online about the collection of personal information. The online notification is provided during the time of training or TA registration.</p>
<p>26 Is the submission of PII by individuals voluntary or mandatory?</p>	<p><input checked="" type="radio"/> Voluntary</p> <p><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>	<p>Training participants can opt-out of the collection or use of their PII by selecting the "opt-out" box in the online LGR form. The LGR form (within CDC TRAIN) is presented before training participants register for their first training course. Training participants can update their LGR at any time to opt-in or opt-out as desired. TA participants are able to opt-out online when requesting TA in CTS, or TA participants can opt-out verbally through the CBA provider. The CBA provider should not electronically submit PII for TA participants that verbally opt-out of the collection or use of their PII.</p>
<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>There are no major changes expected for this information collection. However, each system includes functions and features that allow individuals to be notified by email of system changes and related consents.</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>Each survey cover letter and survey includes a point of contact's name, phone number, and email address to allow individuals to express concerns regarding PII. If an individual voices a concern, the point of contact will follow the agency and division protocol for confirming the appropriateness or inappropriateness of PII use and disclosure. If needed, the point of contact will work with the appropriate data security staff, system administrators, and other project members to resolve the concerns.</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>Data is downloaded from each system at least one time per week. The project's Evaluation Plan, Data Quality Plan, and Data Transfer Report guide the weekly activities that ensure the data's integrity, availability, accuracy and relevancy. Weekly meetings are held with staff responsible for the collection, management, storage, and reporting of the data to ensure comprehensive and thorough periodic reviews.</p>										
<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<table border="0"> <tr> <td><input type="checkbox"/> Users</td> <td></td> </tr> <tr> <td><input checked="" type="checkbox"/> Administrators</td> <td>The Public Health Foundation (PHF) is the CDC TRAIN administrator. PHF is</td> </tr> <tr> <td><input checked="" type="checkbox"/> Developers</td> <td>PHF developers will have access to CDC TRAIN. SeKON developers will</td> </tr> <tr> <td><input checked="" type="checkbox"/> Contractors</td> <td>Direct contractors embedded within TEB perform data management for</td> </tr> <tr> <td><input checked="" type="checkbox"/> Others</td> <td>Designated CDC CDB and TEB staff (i.e., team leads, scientists, and</td> </tr> </table>	<input type="checkbox"/> Users		<input checked="" type="checkbox"/> Administrators	The Public Health Foundation (PHF) is the CDC TRAIN administrator. PHF is	<input checked="" type="checkbox"/> Developers	PHF developers will have access to CDC TRAIN. SeKON developers will	<input checked="" type="checkbox"/> Contractors	Direct contractors embedded within TEB perform data management for	<input checked="" type="checkbox"/> Others	Designated CDC CDB and TEB staff (i.e., team leads, scientists, and
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<input checked="" type="checkbox"/> Others	Designated CDC CDB and TEB staff (i.e., team leads, scientists, and										
<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>System users are determined by their role outlined in respective contracts and cooperative agreements. Each system, CDC TRAIN and CTS are password protected applications, and each have formal steps for obtaining system access. CDC TRAIN and CTS System users are required to complete a form to request access. The request is reviewed by the branch to determine if approval should be granted and the level of access to PII that is appropriate (for example, aggregate or disaggregate data). Upon system access approval, user profiles are customized to limit access to what the user "needs to know" to perform their job role. System users have unique logins and are instructed not to share their login information, especially passwords with colleagues or other individuals to ensure protection of PII.</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>Each system features varying levels of access. "Super-user" roles that allow the view of PII collected by this project are limited to project managers and data management staff that require greater access to provide system oversight and monitor data integrity.</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>Personnel are required to complete the required initial and annual IT security training such as general security and privacy awareness training.</p>										

35 Describe training system users receive (above and beyond general security and privacy awareness training). Webinars are held at least one time per year to discuss data access and data use. Throughout the year, new users receive one-to-one orientation for each systems and the orientation discussion emphasizes proper data access and data use.

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. Personnel will maintain all information in accordance with N1-442-09-001 Bucket 1.

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

Administrative controls: Passwords are only assigned to personnel with a role that requires their use of the PII. The amount of PII available to personnel is uses a "need-to-know" basis. Personnel receive training regarding protecting hard copies and unauthorized electronic access. Access to the data collected through web-based questionnaires is password-protected. The granting of passwords and levels of access are determined by the branch. The site administrator grants and revokes access on a rolling basis.

Technical controls: CDC will maintain information in secure electronic files that will only be accessible to authorized members of the team. Electronic files will be stored on secure network servers, and access will be restricted to approved team members identified by user ID and password. PII is password protected.

Physical controls: Servers are protected by guards, locks, and ID badges.

39 Identify the publicly-available URL: https://www.train.org/cdctrain/welcome  
https://wwwn.cdc.gov/CTS

40 Does the website have a posted privacy notice?  Yes  
 No

41 Does the website use web measurement and customization technology?  Yes  
 No

	Technologies	Collects PII?
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)	<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... <span style="border: 1px solid black; display: inline-block; width: 100px; height: 20px; vertical-align: middle;"></span>	<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

**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

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 Questions		Answer	
<i>Reviewer Notes</i>	<input type="text"/>		
10	Is the PII appropriately limited for use internally and with third parties?	<input checked="" type="radio"/> Yes <input type="radio"/> No	
<i>Reviewer Notes</i>	<input type="text"/>		
11	Does the PIA demonstrate compliance with all Web privacy requirements?	<input checked="" type="radio"/> Yes <input type="radio"/> No	
<i>Reviewer Notes</i>	<input type="text"/>		
12	Were any changes made to the system because of the completion of this PIA?	<input type="radio"/> Yes <input checked="" type="radio"/> No	
<i>Reviewer Notes</i>	<input type="text"/>		
General Comments	<input type="text"/>		
OPDIV Senior Official for Privacy Signature	<input type="text"/>	HHS Senior Agency Official for Privacy	<input type="text"/>