




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

Does this need to migrate to a Sub-Component?: Migrated

Consolidated Parent Component

Component Name

OCIO ISB Infrastructure Services

General Information

| | | | |
|---------------------------|---------------------------------------|------------------------------|--------------------|
| PIA Name: | CDC - EIWT - QTR3 - 2023 - CDC6794740 | PIA ID: | 6794740 |
| Name of Component: | Epi Info Web Tools | Name of ATO Boundary: | Epi Info Web Tools |

Migrated Sub-Component PIA

PIA Name

CDC - OCIO ISB INFR SVCS - Epi Info Web Tools - QTR2 - 2024 - CDC8306986

Sub-Component


Software Name

No Records Found

Original Related PIA ID

PIA Name

No Records Found

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|---------------------------------|---|---------------------------------------|----------|
| Overall Status: |  | PIA Queue: | |
| Submitter: | BROWN, James SHAW, Stephanie | # Days Open: | 358 |
| Submission Status: | Re-Submitted | Submit Date: | 5/7/2024 |
| Next Assessment Date: | 07/09/2027 | Expiration Date: | 7/9/2027 |
| Office: | DDPHSS | OpDiv: | CDC |
| Security Categorization: | Moderate | | |
| Legacy PIA ID: | | Make PIA available to Public?: | Yes |
| 1: | Identify the Enterprise Performance Lifecycle Phase of the system | Disposition | |
| 2: | Is this a FISMA-Reportable system? | Yes | |
| 3: | Does the system have or is it covered by a Security Authorization to Operate (ATO)? | Yes | |
| 4: | ATO Date or Planned ATO Date | 5/30/2024 | |

Privacy Threshold Analysis (PTA)

PTA Name

CDC - EIWT - QTR3 - 2023 - CDC6792894

History Log: [View History Log](#)

PTA

PTA

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| PTA - 2: | Indicate the following reason(s) for this PTA. Choose from the following options. | PIA Validation (PIA Refresh) |
| PTA - 2A: | Describe in further detail any changes to the system that have occurred since the last PIA. | Submitted for Annual Assessment |
| PTA - 3: | Is the data contained in the system owned by the agency or contractor? | Agency |

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| 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. | <p>The Epi Info Web Tools (EIWT) allows CDC users with authorized access to the EIWT to create, distribute, and receive completed online surveys to gather information for analysis. The survey can be distributed to the targeted audience using emails or any other electronic form. Each survey is accessed using the URL that is unique to a given survey. A CDC employee will be able to download the survey responses from the web and analyze the survey data any time during the period the survey is open or after the survey has closed.</p> |
| 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. | <p>CDC programs use the EIWT to collect public health data for epidemiological investigations and research studies. The system collects data that enables epidemiologists to conduct outbreak investigations, track cases, perform contact tracing, evaluate public health interventions, and collect information on attitudes and behaviors that impact public health outcomes.</p> <p>Programs that use this system must sign an agreement after reading the Rules of Behavior (RoB) document that explicitly indicates the terms and usage of the system and what information can be collected. The data collected may vary dependent upon the unique variables needed by individual research studies. However, any data collected must fall within the parameters of the RoB, and as such is limited to:</p> <p>Name, Date of Birth or Age, Sex, Mailing Address, Physical Address, Physical locations traveled, Email Address, Phone Number, Photographic Identifiers, Employment Status, Occupation, Disease Status, Disease Signs and Symptoms, and Behavior Information that impacts Public Health.</p> <p>Social Security Numbers (SSN) are not allowed to be collected by the EIWT. Data from this system is not shared with any other system(s).</p> <p>External users (survey respondents): No user credentials collected or required.</p> |
| PTA - 5A: | Are user credentials used to access the system? | |
| PTA - 5B: | Please identify the type of user credentials used to access the system. | |

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| 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. | <p>EIWT are unique systems that allows for the creation of a survey by a CDC user based on the need to conduct an epidemiological investigation. The survey owner may choose to collect PII as part of their survey. All data will be stored inside the EIWT. EIWT do not share any of this data with any other system.</p> <p>Data elements that can be collected in a survey include: Name, Date of Birth or Age, Sex, Mailing Address, Physical Address, Physical locations traveled, Email Address, Phone Number, Photographic Identifiers, Employment Status, Occupation, Disease Status, Disease Signs and Symptoms, and Behavior Information that impacts Public Health.</p> <p>Social Security Numbers (SSN) are not allowed to be collected by the EIWT. Data from this system is not shared with any other system(s). Survey respondents have the choice to not respond to specific questions or the survey itself.</p> <p>Examples of epidemiological investigations that surveys can be created for:</p> <ol style="list-style-type: none"> 1. Collecting baseline data regarding prevalence and incidence of infections on a specific disease in a given population. 2. Conduct community based evaluations of interventions. 3. Conduct surveys on attitudes and behaviors around specific public health initiatives. 4. Conduct surveys on Flu vaccine knowledge, attitudes and beliefs. 5. Conduct surveys about the level of knowledge and use of personal protective equipment in a hazardous workplace environment or among a particular occupation. <p>External users (survey respondents): No user credentials collected or required. Users navigate directly to survey with a system generated unique URL. Internal users: Authenticated through Active Directory (AD). AD is a separate system with its own PIA.</p> |
| PTA - 7: | Does the system collect, maintain, use or share PII? | Yes |
| PTA - 7A: | Does this include Sensitive PII as defined by HHS? | Yes |
| PTA - 8: | Does the system include a website or online application? | Yes |
| PTA - 8A: | Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)? | Yes |

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| PTA - 9: | 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. | The Epi Info Web Tools (EIWT) allows CDC users with authorized access to the EIWT to create, distribute, and receive completed online surveys to gather information for analysis. The survey scan be distributed to the targeted audience using emails or any other electronic form. Each survey is accessed using the URL that is unique to a given survey. A CDC employee will be able to download the survey responses from the web and analyze the survey data any time during the period the survey is open or after the survey has closed. |
| PTA - 10: | Does the website have a posted privacy notice? | Yes |
| PTA - 11: | Does the website contain links to non-federal government websites external to HHS? | No |
| PTA - 11A: | Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS? | |
| PTA - 12: | Does the website use web measurement and customization technology? | Yes |
| PTA - 12A: | Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII. | Session Cookies - Does Not Collect PII |
| PTA - 13: | Does the website have any information or pages directed at children under the age of thirteen? | No |
| PTA - 13A: | Does the website collect PII from children under the age thirteen? | |
| PTA - 13B: | 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? | |
| PTA - 14: | Does the system have a mobile application? | No |
| PTA - 14A: | Is the mobile application HHS developed and managed or a third-party application? | HHS |
| PTA - 15: | Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response. | |
| PTA - 16: | Does the mobile application/ have a privacy notice? | |
| PTA - 17: | Does the mobile application contain links to non-federal government website external to HHS? | |
| PTA - 17A: | Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS? | |
| PTA - 18: | Does the mobile application use measurement and customization technology? | |
| PTA - 18A: | Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected. | |
| PTA - 19: | Does the mobile application have any information or pages directed at children under the age of thirteen? | |
| PTA - 19A: | Does the mobile application collect PII from children under the age thirteen? | |
| PTA - 19B: | 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? | |
| PTA - 20: | Is there a third-party website or application (TPWA) associated with the system? | No |
| PTA - 21: | Does this system use artificial intelligence (AI) tools or technologies? | No |

| PIA | | |
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| PIA - 1: | Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share. | Name Email Address Phone numbers Foreign Activities Date of Birth Photographic Identifiers Mailing Address Employment Status Other - Free text Field - Medical Information |
| PIA - 2: | Indicate the categories of individuals about whom PII is collected, maintained or shared. | Business Partners/Contacts (Federal, state, local agencies) Employees/ HHS Direct Contractors Patients Members of the public |
| PIA - 3: | Indicate the approximate number of individuals whose PII is maintained in the system. | Above 2000 |
| PIA - 4: | For what primary purpose is the PII used? | PII is used to assess exposure risks, monitor outcomes and interventions, monitor behaviors and their impact to public health interventions. |
| PIA - 5: | Describe any secondary uses for which the PII will be used (e.g. testing, training or research). | Research and the assessment of policy and practice is the secondary use for the PII. |
| PIA - 6: | Describe the function of the SSN and/or Taxpayer ID. | N/A |
| PIA - 6A: | Cite the legal authority to use the SSN. | N/A |
| PIA - 7: | Identify legal authorities, governing information use and disclosure specific to the system and program. | Public Health Service Act, 42 U.S. Code § 300u |
| PIA - 8: | Are records in the system retrieved by one or more PII data elements? | No |
| PIA - 8A: | Please specify which PII data elements are used to retrieve records. | |
| PIA - 8B: | 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. | |
| PIA - 9: | Identify the sources of PII in the system. | Directly from an individual about whom the information pertains In-person Online Government Sources Within the OPDIV Other HHS OPDIV State/Local/Tribal Other Non-Government Sources Members of the Public |

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| PIA - 10: | Is there an Office of Management and Budget (OMB) information collection approval number? | No |
| PIA - 10A: | Provide the information collection approval number. | |
| PIA - 10B: | Identify the OMB information collection approval number expiration date. | |
| PIA - 10C: | Explain why an OMB information collection approval number is not required. | The surveys maintained in this system are varied-some are subject to the Paperwork Reduction Act, others not.; however, if a particular survey is subject to the Paperwork Reduction Act, the survey owner will be responsible for obtaining the OMB approval number. Therefore, there is no one OMB Control Number that covers all. |
| PIA - 11: | Is the PII shared with other organizations outside the system's Operating Division? | No |
| PIA - 11A: | Identify with whom the PII is shared or disclosed. | |
| PIA - 11B: | Please provide the purpose(s) for the disclosures described in PIA - 11A. | |
| PIA - 11C: | 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)). | |
| PIA - 11D: | 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. | |
| PIA - 12: | Is the submission of PII by individuals voluntary or mandatory? | Voluntary |
| PIA - 12A: | If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties. | |
| PIA - 13: | 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. | Individuals may opt-out of the collection and use of their PII by not participating or entering PII into the survey. |
| PIA - 14: | 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. | Should major changes ever occur to the system, CDC will not always have the capability to notify and obtain consent. The dependency is on the particular questions on the survey and its purpose (PII questions pertaining to contact information are not always asked). Surveys may not have any identifier other than a random number so there would be no way to know who filled out the form because submissions would be anonymous. If data use changes during or after the program collected data, and the survey collected contact information, then the program in question using EIWT would contact the users directly to obtain consent for those changes. These terms are outlined in the system's Rules of Behavior (ROB) document. |
| PIA - 15: | 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 program contact that signed EIWT's Rules of Behavior (ROB) document, is also the person who creates and publishes the surveys. The Rules of Behavior states that the program agrees to provide an email contact address within the survey for respondents to send questions or concerns. Thus, the program who designed and deployed the survey would be responsible for handling these concerns. |

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| PIA - 16: | 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. | <p>EIWT system administrators require a CDC user to sign the Rules of Behavior in order to use the tools. EIWT system administrators verbally go over the Rules of Behavior with the CDC user who signed it. The Rules of Behavior states that the survey administrators will, at a minimum, annually review the surveys' PII for integrity, availability, accuracy and relevancy. They also have the right to review the PII collected at any time, if they suspect integrity, availability, accuracy, or relevancy has been compromised.</p> |
| PIA - 17: | Identify who will have access to the PII in the system. | <p>Administrators Developers Contractors Others</p> |
| PIA - 17A: | Select the type of contractor. | HHS/OpDiv Direct Contractors |
| PIA - 17B: | Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices? | Yes |
| PIA - 18: | Provide the reason why each of the groups identified in PIA - 17 needs access to PII. | <p>EIWT program management assigns specific system administrators and developers, the authority to access, write, update, and maintain the systems. EIWT management also maintains a Web Survey Terms of Access and Use document that outlines how access is granted and outlines the publishing process.</p> <p>Administrators need to set up the data owner for the program in the system and give them the encryption keys in order for them to create and distribute the survey, send email alerts.</p> <p>Developers have access to the production database to assist in trouble shooting issues with the system.</p> <p>Some EIWT employees are direct contractors who have access to the production database to assist in trouble shooting issues with the system.</p> <p>Others, The program data owner of the form who has the key to publish the forms and can download the data.</p> |
| PIA - 19: | Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII. | <p>EIWT program management assigns specific system administrators and developers, the authority to access, write, update, and maintain the systems. EIWT management also maintains a Web Survey Terms of Access and Use document that outlines how access is granted and outlines the publishing process.</p> |

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| <p>PIA - 20:</p> | <p>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.</p> | <p>CDC System administrators and developers are provided access to the system on a need to know basis and audit controls are in place to track their activity on the servers and within the consolidated database environment. These individuals are responsible for supporting, building, and maintaining the system itself and require full access to the entire application.</p> |
| <p>PIA - 21:</p> | <p>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.</p> | <p>All internal users of the system are required to complete the security and privacy awareness training at least annually.</p> |
| <p>PIA - 22:</p> | <p>Describe training system users receive (above and beyond general security and privacy awareness training).</p> | <p>None</p> |
| <p>PIA - 23:</p> | <p>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).</p> | <p>EIWT data is kept by the CDC as a historical public health record, per CDC's "Scientific and Research Project Records Control Schedule", section 1a ("Authorized Disposition: PERMANENT"). Records Schedule N1-442-09-1. After two years the data will be securely purged from the system.</p> |
| <p>PIA - 24:</p> | <p>Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.</p> | <p>Administrative Controls: EIWT system and data, including the PII contained in the system is secured according to CDC security guidelines. The CDC Enterprise Master System Security Plan covers this system. These controls include the enforcement of user roles and by having users agree to system Rules of Behavior and taking mandatory CDC Security Awareness Training and Records Management training at least annually.</p> <p>Technical Controls: Access to the EIWT system is controlled via CDC's Personal Identification Verification compliant infrastructure, which features user identification, Smart Cards, strong frequently changed passwords, firewalls, intrusion detection systems, and common access cards. Privileged users such as system administrators and database administrators are vetted by the CDC and access data according to the principle of least-privilege.</p> <p>Physical Controls: The EIWT system is in a physically secure area with security guards, video cameras, ID badges, locked doors and key cards.</p> |

Review & Comments

Privacy Analyst Review

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|---|---|-------------------------------------|-----------|
| OpDiv Privacy Analyst Review Status: | Approved | Privacy Analyst Review Date: | 5/15/2024 |
| Privacy Analyst Comments: | OpDiv Analyst: Joshua Mosios (Contractor) | Privacy Analyst Days Open: | |

SOP Review

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|---------------------------|--------------------------------------|-------------------------|--------------------|
| SOP Review Status: | Approved | SOP Signature: | JWO Signature.docx |
| SOP Comments: | Approved on behalf of Beverly Walker | SOP Review Date: | 5/21/2024 |
| | | SOP Days Open: | 14 |

Agency Privacy Analyst Review

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| Agency Privacy Analyst Review Status: | Approved | Agency Privacy Analyst Review Date: | 5/28/2024 |
| Agency Privacy Analyst Review Comments: | <p>7/9/2024 Per CDC, this system is migrating from a Stand-Alone Component to a Sub-Component within the ISB Infrastructure. In addition to this system having its own PTA/PIA, ISB Infrastructure will have its own approved PTA.</p> <p>5/28/2024 Per CDC email, PTA-14A defaults to "HHS," and they were unable to make it blank. PTA-14A respond should be blank or "No." We have confirm this system has no mobile application via the attached PIA (see supporting Documentation. This PIA is ready for SAOP review and approval.</p> | Agency Privacy Analyst Days Open: | 7 |

SAOP Review

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| SAOP Review Status: | Approved | SAOP Signature: | |
| SAOP Comments: | <p>Per CDC, this system is migrating from a Stand-Alone Component to a Sub-Component within the ISB Infrastructure. In addition to this system having its own PTA/PIA, ISB Infrastructure will have its own approved PTA.</p> <p>Per CDC email, PTA-14A defaults to "HHS," and they were unable to make it blank. PTA-14A respond should be blank or "No." We have confirm this system has no mobile application via the attached PIA (see supporting Documentation.</p> | SAOP Review Date: | 7/9/2024 |
| | | SAOP Days Open: | 42 |

Supporting Document(s)

| Name | Size | Type | Upload Date | Downloads |
|----------------------|--------|------|--------------------|-----------|
| EIWT-PIA 2024_V2.pdf | 337451 | .pdf | 4/30/2024 10:45 AM | 3 |

| Comments | | | | |
|---------------|----------------|-----------|---|------------|
| Question Name | Submitter | Date | Comment | Attachment |
| PIA - 18 | MOSIOS, Joshua | 4/30/2024 | Please provide a distinct reason for each group. | |
| PIA - 10C | MOSIOS, Joshua | 4/30/2024 | Does this system not have its own OMB collection number? If so, please change answer in 10 to "yes" | |
| PIA - 10A | MOSIOS, Joshua | 5/6/2024 | Please provide the OMB collection number that this system relies on. | |
| PIA - 1 | MOSIOS, Joshua | 5/6/2024 | In the free text field, please add "medical information". | |
| PIA - 19 | MOSIOS, Joshua | 5/6/2024 | Your answer here and in 20 were previously used together to answer question 20's equivalent in the previous form (question 33). Please use your answer in the question 19 equivalent (32) here. | |
| PIA - 10B | MOSIOS, Joshua | 5/6/2024 | What OMB number does this expiration date belong to? | |
| PIA - 10C | OSHODI, Jarell | 5/21/2024 | The response was edited: The surveys maintained in this system are varied-some are subject to the Paperwork Reduction Act, others not.; however, if a particular survey is subject to the Paperwork Reduction Act, the survey owner will be responsible for obtaining the OMB approval number. Therefore, there is no one OMB Control Number that covers all. | |