

Attachment 24 –

OCISO Standard for Limiting the Use of Social Security Numbers in CDC Information Systems

Attachment A. SSN Elimination or Usage Approval Request for Modernization Platform (MPN)

Date Submitted: 07/17/2019

Submitted by: Karlecia Lucas

Office/Branch: CDC/NIOSH/OD

Telephone: 404-498-1988

Select Recommended Path forward:

☐ **A.** Eliminate the use of SSNs within Modernization Platform (MPN). The milestone date for complete elimination of SSNs is: 00/00/0000. A certification of completion must be provided to the appropriate ISSO on or before this date.

☒ **B.** Request the CDC Senior Official for Privacy (SOP), approve collecting, processing, or storing SSNs in Modernization Platform (MPN) within the parameters stipulated in the *OCISO Standard for Limiting the Use of Social Security Numbers in CDC Information Systems*.

If Option A is selected, only Section 4 of this form must be completed. If Option B is selected, please complete all remaining sections of this form:

1. JUSTIFICATION.

Modernization Platform (MPN) is a strategic effort to align existing National Institute for Occupational Safety and Health (NIOSH) investments to open standards and modern data services. This platform provides a framework to effectively manage and provide oversight of NIOSH Information Technology (IT) systems while encouraging the adoption of the NIOSH Analytical Data Warehouse and the Centers for Disease Control and Prevention (CDC) Cloud Strategy. The platform will be Federal Information Technology Acquisition Reform Act (FITARA) compliant in planning, programming, and budgeting and is Federal Information Security Management Act (FISMA) Moderate.

MPN uses miner's social security numbers (SSN) to search for data, verify identity, and group radiographs taken during a miner's lifetime. SSNs are also used to link records with data source records. Some sources, like Internal Revenue Service (IRS), require the SSN explicitly. SSN is also used in determining whether a match is for a particular worker. The set of information which MPN and the data source have in common typically consists of SSN, name, date of birth, and gender. These fields are used to ascertain whether a linked record for a worker is a true match, a false match, or whether it remains unclear. Without the SSN, many of these determinations would be impossible.

2. BACKGROUND. *Describe additional information necessary for effective decision-making.*

(1) ALTERNATIVES.

NIOSH could request medical release forms from each mine worker on an OMB form without collecting SSNs. NIOSH determined it would create additional administrative expenses and place additional paperwork on the mine worker.

(2) E-AUTHENTICATION.

External systems access to MPN is managed through NIOSH using CDC Secure Access Management Services (SAMS). SAMS uses HTTPS for securing data in transit and MPN data is stored on encrypted servers.

(3) DATA AT REST ENCRYPTION.

The MPN file share is set up by ITSO and is maintained using MUST encrypted storage. MPNs PII and SSNs are stored on always encrypted database servers. Access is managed through the CDC/NIOSH Active Directory. This directory is audited regularly and no further action is necessary.

(4) OTHER FACTS OR ASSUMPTIONS.

MPN is a platform system that is expected to have additional platforms in the future. New mine workers will submit PII, SSNs, and data for research. Thus, there will be continuous effort to update scientific inquiries, safely secure information, and use the collected data to provide scientific analysis on occupational safety and health.

3. IMPACT OF SUCCESS OR FAILURE. *State the results, in terms of business outcomes, of approving or not approving this request.*

Approval of the use of SSN's in MPN would allow NIOSH to collect identifying information about the workers involved in safety incidents to ensure collected data is associated with the correct person. MPN uses miner's social security numbers (SSN) to search for data, verify identity, and group radiographs taken during a miner's lifetime. SSNs are also used to link records with data source records. Some sources, like Internal Revenue Service (IRS), require the SSN explicitly. SSN is also used in determining whether a match is for a particular worker. Without the SSN, many of these determinations would be impossible.



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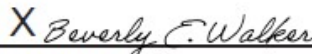
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4. APPROVAL. *Business Steward Sign and Date only-*

	NAME	DATE
Business Steward Signature	7/17/2019  Michael Loudermilk Associate Director of Informatics Signed by: William B. Brinkley III -S	07/17/2019
Business Steward Printed Name	Bill Brinkley (Alternate) signing for Mike Loudermilk	

For SOP Only --Decision and Signature:

Approved: x Disapproved:



 Beverly E. Walker
 Chief Privacy Officer