

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.

MMRIA provides a repository for the medical and social information needed for maternal mortality review committee (MMRC) case review and standardizes data that can be used for surveillance, monitoring, and research of maternal mortality. MMRIA provides a common language that helps MMRCs to collaborate in case review and analyses. MMRIA is a multi-user data entry system designed to flow like a case review. MMRIA's abstraction forms and tools help MMRC members to understand the story of a woman's life and the events leading to her death. Devised to accommodate the scope of work and processes of MMRCs, the system supports abstraction and captures committee decisions. MMRIA provides access to semi-automated case narrative templates from which committee members can print easy-to-read case narrative details. Lastly MMRIA captures socio-spatial information, through geocoding of addresses, to expand case discussions and analyses.

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.)

MMRIA captures medical and social information on female U.S. residents who die during pregnancy or within one year of the end of pregnancy. The sources of the data includes:
 death certificate
 birth certificate for the index pregnancy if applicable
 autopsy reports
 prenatal care records
 hospitalization records
 medical transport records,
 informant interviews
 maternal mortality review committee deliberations
 other medical office records.

Each record may contain up to 1000 data elements. A full list of all data elements collected is available at <http://demo.mmria.org/data-dictionary/>.

The types of PII collected are: name, mother's maiden name, email address, medical notes, certificates, military status, date of birth, mailing address, medical records number, and employment status.

Users authenticate to the system with a user id and password which are stored until access is removed by the system administrator. User credentials are reviewed annually. CDC Secure Access Management System (SAMS) provides user authentication and is covered by a separate PIA.

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

The system provides a repository for collection of medical and social information surrounding an individual maternal death. The types of PII collected are: name, mother's maiden name, email address, medical notes, certificates, military status, date of birth, mailing address, medical records number, and employment status. The data is used to facilitate review by state or jurisdiction-based maternal mortality review committees (MMRCs). It captures MMRC findings and also provides a cumulative record of standardized indicators common to most maternal deaths that can be used for surveillance, monitoring and evidence-informed responses to maternal mortality.

In order to comprehensively review each case of maternal death, MMRCs must capture detailed medical and social information on each woman who dies during pregnancy or within one year of the end of pregnancy in their jurisdiction. Nurse abstractors glean this information by accessing medical records and social service records, death certificates, birth certificates where applicable, and autopsy reports. They then manually enter relevant case details into MMRIA. The system provides a semi-automated case narrative that abstractors then print and provide to committee members to discuss during MMRC meetings, which occur monthly or quarterly. During or shortly after meetings, abstractors enter the committee deliberations including findings on preventability, contributing factors, and recommendations for action.

The data provided by MMRIA is essential to achieving CDC's Division of Reproductive Health's goal of improving pregnancy health and care, and increasing the number of countries and U.S. states that use effective surveillance systems to monitor and review maternal deaths. The system supports CDC's role in detecting and responding to new and emerging health threats, in tackling the biggest health problems causing death and disability for Americans, and in bringing new knowledge to individual health care and community health to save lives.

Users authenticate to the system with a user id and password are stored until access is removed by the system administrator. User credentials are reviewed annually. CDC Secure Access Management System (SAMS) provides user authentication and is covered by a separate PIA.

- 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 checked="" 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 checked="" 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 type="checkbox"/> Phone Numbers | <input checked="" type="checkbox"/> Medical Records Number |
| <input checked="" type="checkbox"/> Medical Notes | <input type="checkbox"/> Financial Account Info |
| <input checked="" type="checkbox"/> Certificates | <input type="checkbox"/> Legal Documents |
| <input type="checkbox"/> Education Records | <input type="checkbox"/> Device Identifiers |
| <input checked="" type="checkbox"/> Military Status | <input checked="" type="checkbox"/> Employment Status |
| <input type="checkbox"/> Foreign Activities | <input type="checkbox"/> Passport Number |
| <input type="checkbox"/> Taxpayer ID | |

- 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 type="checkbox"/> Vendors/Suppliers/Contractors |
| <input type="checkbox"/> Patients |

Other

Deceased women who resided in U.S. jurisdictions at the time of death and who died during pregnancy or within one year of the end of pregnancy; date of birth is also collected for infants born of the index pregnancy of the deceased woman

- 17 How many individuals' PII is in the system?

500-4,999

- 18 For what primary purpose is the PII used?

The PII is used for process management. The abstractors need to be able to identify individual records in order to enter data accurately and write a de-identified case narrative that is then presented to maternal mortality review committee members.

Abstractors remove all identifiers before presenting a case to the committee. The committee members use the de-identified case narrative to identify contributing factors to the woman's death and make recommendations for systems-level improvement.

- 19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)

Though abstractors remove all identifiers before presenting a case to the committee, military status and employment status may be included in the case narrative presented to committee members in order to inform committee deliberations. These pieces of information are used to identify contributing factors to the woman's death and to make recommendations.

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 306(h) (42 U.S.C. 242k.)

22 Are records on the system retrieved by one or more PII data elements?

☒ Yes☐ 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:

09-20-0166 Vital Statistics for Births, Deaths, Fetal Deaths, Marriages and Divorces Occurring in the United States During Each Year

Published:

Published:

☐ In Progress

23 Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

☐

In-Person

☐

Hard Copy: Mail/Fax

☐

Email

☐

Online

☐

Other

Government Sources

☐

Within the OPDIV

☐

Other HHS OPDIV

☒

State/Local/Tribal

☐

Foreign

☐

Other Federal Entities

☐

Other

Non-Government Sources

☐

Members of the Public

☐

Commercial Data Broker

☐

Public Media/Internet

☐

Private Sector

☐

Other

23a Identify the OMB information collection approval number and expiration date.

N/A

24 Is the PII shared with other organizations?

☐ Yes☒ 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.	<p>Maternal mortality data: No prior notice given because individuals are deceased. Authority to collect records on maternal deaths is established at the state or city level.</p> <p>User data: Notification of collection of users' PII for user authentication is conducted through SAMS, which is covered through a separate PIA.</p>
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.	<p>Maternal mortality data: No method exists because individuals are deceased.</p> <p>User data: Notification of collection of users' PII for user authentication is conducted through SAMS, which is covered through a separate PIA. Email address is a requirement of system usage.</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>Maternal mortality data: No method exists because individuals are deceased. The majority of PII captured in the system relates to the deceased women. The birth certificate numbers and dates of birth for infants born of the deceased woman's index pregnancy are captured when applicable, but state- and city-level authority to conduct maternal mortality review precludes the need to notify or obtain consent from these infants.</p> <p>User data: Users will be notified via email if major changes occur.</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>Maternal mortality data: No process exists because individuals are deceased.</p> <p>User data: Users can contact their CDC point of contact to resolve concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.</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>Maternal mortality data: CDC does not have a process in place for periodic reviews of PII. CDC does not have access to the data. Each state and city is responsible for conducting periodic reviews of data integrity, availability, accuracy, and relevancy.</p> <p>User data: User credentials are reviewed annually by CDC and state/city points of contact. CDC Secure Access Management System (SAMS) provides user authentication and is covered by a separate PIA.</p>

31	Identify who will have access to the PII in the system and the reason why they require access.	<input checked="" type="checkbox"/> Users	a limited set of users assigned "abstractor" user role. PII is necessary for process management and for abstractors to produce a de-identified
		<input type="checkbox"/> Administrators	
		<input type="checkbox"/> Developers	
		<input type="checkbox"/> Contractors	
		<input type="checkbox"/> Others	
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Access is only granted by the CDC/CDC Foundation staffers to the User Administrators at the state or city level (Jurisdiction Administrator). The Jurisdiction administrator would identify and assign abstractor access to the individual or select individuals in each state who are responsible for reviewing the medical and social records and abstracting that information into the system.	
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.	Role based access controls are in place to ensure the concept of "Least Privilege" model is implemented and only those who need access will have access. Based on the CDC/CDC Foundation staffers and Jurisdiction Administrator, Abstractors may only view records within their state or city.	
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.	Training and awareness on best practices regarding PII collection and confidentiality is provided to personnel at both the state and city level and by the project team at CDC's Division of Reproductive Health. The project team provides this training during initial onboarding of new user jurisdictions and at annual trainings.	
35	Describe training system users receive (above and beyond general security and privacy awareness training).	CDC Division of Reproductive Health staff provide a MMRIA User Manual, annual abstractor and data analysis trainings, and onsite visits to states and cities before, during, and after MMRIA adoption.	
36	Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	<input checked="" type="radio"/> Yes <input type="radio"/> No	
37	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.	MMRIA data is owned by the state or jurisdiction entering the data, not CDC. CDC considers the MMRIA data as intermediary records (GRS 5.2). The records, include the PII, will be destroyed when no longer needed for business use.	

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

Administrative Controls:

Access to PII follows a least privilege model. Access is limited to those authorized and needing to use the data to perform job related duties.

Technical Controls:

Access to PII follows a least privilege model. Secure logins will be used to prevent unauthorized access. Multi factor authentication is required for all users. Storage will utilize FIPS-compliant encryption.

Physical Controls:

Physical measures, policies, and procedures are in place to protect information, buildings, and equipment from unauthorized intrusions, environmental hazards, and natural hazards. Server room remains locked at all times with access limited to individual authorized IT staff with proper security privileges.

General Comments

OPDIV Senior Official
for Privacy Signature