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.

<u>Acronyms</u>
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?:

Consolidated Parent Component

Component Name

No Records Found

General Information

PIA Name:	CDC - ELC CAMP - QTR2 - 2023 - CDC6775901	**PIA ID:**	6775901
Name of Component:	ELC Cooperative Agreement Management Platform	**Name of ATO Boundary:**	ELC Cooperative Agreement Management Platform

Migrated Sub-Component PIA

PIA Name

No Records Found

Sub-Component

Software Name
No Records Found

Original Related PIA ID

PIA Name
No Records Found

Overall Status:	✅	**PIA Queue:**	
Submitter:	MEEKS, Arivey WANG, Terry	**# Days Open:**	190
Submission Status:	Re-Submitted	**Submit Date:**	11/7/2023
Next Assessment Date:	12/11/2026	**Expiration Date:**	12/11/2026
Office:	DDID	**OpDiv:**	CDC
Security Categorization:	Moderate		
Legacy PIA ID:		**Make PIA available to Public?:**	Yes
1:	Identify the Enterprise Performance Lifecycle Phase of the system		
2:	Is this a FISMA-Reportable system?		
3:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		
4:	ATO Date or Planned ATO Date		8/7/2023

Privacy Threshold Analysis (PTA)

PTA Name
CDC - ELC CAMP - QTR1 - 2023 - CDC6668371
History Log: **View History Log**

PTA

PTA

PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	New
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	
PTA - 3:	Is the data contained in the system owned by the agency or contractor?	Agency
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.	The size and complexity of Epidemiology and Laboratory Capacity (ELC) Cooperative Agreement, with so many CDC staff and recipients involved in the grants process, creates challenges for effective grants management and coordination. The ELC Cooperative Agreement Management Platform (CAMP) is a software as a service (SaaS) cloud solution using the FedRAMP approved third party platform. It combines several disparate systems, tools, and processes for collecting cooperative agreement workplans, completing technical reviews, collecting data from performance measures, managing budgets for analysis, reporting and information sharing, reduce data quality issues which will reduce ELC staff hours on data prep and cleaning and increase functionalities across the cooperative agreement management process resulting in less manual work for ELC Project Officers, program staff, and recipients to find relevant information. Data contained within this system enables grant management, information sharing between CDC and recipients, and performance and progress monitoring of grant work. CDC owns the data contained within this system per terms of the cooperative agreement. The system contains

programmatic, financial, performance, and grant management data, collected from state, local, and territorial health departments and provided / entered by CDC personnel. Data will be collected through direct entry into the Third Party Vendor platform at the program set by the schedule of the Cooperative Agreement but will utilize at least monthly data collections. Data will be used by CDC and health department recipients to manage their public health activities funded through the ELC Cooperative Agreement, including monitoring financial draw down, progress and performance management reporting. The data may be exported for use in analytical tools and statistical analysis, including Excel, Statistical Analysis System (SAS), Power BI (business intelligence , and other agency approved tools for data analysis. For example, partner programs (CDC users) may export performance measure data reported by recipients in order to analyze the impact of their funding on the capacity building outputs and outcomes intended in the program logic model.

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.

The system contains programmatic, financial, performance, and grant management data, collected from state, local, and territorial health departments and provided / entered by CDC personnel, including Owner Identity Information, Business Type, and Business Name. In addition, ELC CAMP system collects following PII information:
Address
City
State
Zip
Contact Name
Contact Title
Contact Phone Number
Contact Email
Financial Information
Salary info for grant budget
Award details

PTA - 5A: Are user credentials used to access the system?

PTA - 5B: Please identify the type of user credentials used to access the system.

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.

ELC CAMP is a Moderate cloud solution using the FedRAMP approved Third Party Vendor platform. Information will be entered by recipients for the purposes of general information, program and performance monitoring, and financial management of the program and recipients. Limited PII will be collected as detailed below. Data will be collected, maintained and shared within the Third Party Vendor Environment, with limited exports (download) for use by CDC programs as needed.

The system contains programmatic, financial, performance, and grant management data, collected from state, local, and territorial health departments and provided / entered by CDC personnel, including Owner Identity Information, Business Type, and Business Name. In addition, ELC CAMP system collects following PII information:
Address
City
State
Zip
Contact Name
Contact Title
Contact Phone Number
Contact Email

Financial Information
Salary info for grant budget
Award details

Data will be used by CDC and health department recipients to manage their public health activities funded through the ELC Cooperative Agreement, including monitoring financial draw down, progress and performance management reporting. The data may be exported for use in analytical tools and statistical analysis.

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)?	No
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 Third Party Vendor system combines several disparate systems, tools, and processes for collecting cooperative agreement workplans, completing technical reviews, collecting data from performance measures, managing budgets for analysis, reporting and information sharing, reduce data quality issues which will reduce ELC staff hours on data prep and cleaning and increase functionalities across the cooperative agreement management process resulting in less manual work for ELC Project Officers, program staff, and recipients to find relevant information. ELC CAMP users are authenticated through CDC Secure Access Management System (SAMS). CAMP(Recipient) Users will have access to propagate their own identifying attributes and review case status. CAMP Administrators (CDC) will have access in order to perform support and evaluate records and cases for program management, evaluation and monitoring. URL will be accessed through username and password.
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?	No
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to 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?	
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

PIA

PIA - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address Phone numbers Mailing Address Other - Free text Field - Salary info for grant budget Financial Information Award details
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
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?	Program Management
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	Grant Financial Management
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, 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)). E.O. 9397, November 22, 1943 (as Amended by E.O. 13478, 18 November 2008)
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
		
		  Online
		
		Government Sources
		
		  Within the OPDIV
		
		  State/Local/Tribal
		
		  Other Federal Entities
		
		Non-Government Sources
		
		  Public Media/Internet

		Private Sector
PIA - 10:	Is there an Office of Management and Budget (OMB) information collection approval number?	No
PIA - 10A:	Provide the information collection approval number.	N/A - Data is collected under terms of the Epidemiology and Laboratory Capacity Cooperative Agreement.
PIA - 10B:	Identify the OMB information collection approval number expiration date.	
PIA - 10C:	Explain why an OMB information collection approval number is not required.	N/A - Data is collected under terms of the Epidemiology and Laboratory Capacity Cooperative Agreement.
PIA - 11:	Is the PII shared with other organizations outside the system's Operating Division?	Yes
PIA - 11A:	Identify with whom the PII is shared or disclosed.	Within HHS
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	This is a standalone SaaS system for CDC National Center for Emerging and Zoonotic Infectious Diseases (NCEZID) in the third-party vendor and no other known components will be attached to this system. ELC Cooperative Agreement Management Platform (ELC CAMP) will combine several disparate systems, tools, and processes for collecting cooperative agreement workplans, completing technical reviews, collecting data from performance measures, managing budgets for analysis, reporting and information sharing, reduce data quality issues which will reduce ELC staff hours on data prep and cleaning and increase functionalities across the cooperative agreement management process resulting in less manual work for ELC Project Officers, program staff, and recipients to find relevant information. Data contained within this system enables grant management, information sharing between CDC and recipients, and performance and progress monitoring of grant work. . The ELC Cooperative Agreement Management Platform (CAMP) is a software as a service (SaaS) cloud solution using the Federal Risk and Authorization Management Program (FedRAMP) approved Salesforce platform. It combines several disparate systems, tools, and processes for collecting cooperative agreement workplans, completing technical reviews, collecting data from performance measures, managing budgets for analysis, reporting and information sharing, reduce data quality issues which will reduce ELC staff hours on data prep and cleaning and increase functionalities across the cooperative agreement management process resulting in less manual work for ELC Project Officers, program staff, and recipients to find relevant information. Data contained within this system enables grant management, information sharing between CDC and recipients, and performance and progress monitoring of grant work. CDC owns the data contained within this system per terms of the cooperative agreement. ELC CAMP users are authenticated through CDC Secure Access Management System (SAMS). CAMP(Recipient) Users will have access to propagate their own identifying attributes and review case status. CAMP Administrators (CDC) will have access in order to perform support and evaluate records and cases for program management, evaluation and monitoring. URL will be accessed through username and password.
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)).	Terms of Epidemiology and Laboratory Capacity Cooperative Agreement
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.	Disclosures are consistent with ELC programs standard operating procedures (SOPs) for technical review of grants management activities.
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.	For individual users of ELC CAMP there is no opt-out to the collection and use of their PII is required to access the system and for the disbursement of the federal funds they are requesting. A user who wishes to "opt-out" will not be granted a system account.
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.	Individuals cannot be directly notified of any major changes because the system does not collect contact information. If notification becomes necessary, CDC can contact the state health department, who may have contact information, but there is no guarantee that these entities have this information.
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.	Recipients or employers are able to escalate privacy related incidents to the CDC ELC CAMP support team or project owner through website-based contacts or the ELC CAMP help desk (elc@cdc.gov). With contact information (i.e., organization group email address, office phone number, etc.).
		Alternatively, the employee or the CDC Computer Security Incident Response Team (**CSIRT**), in the event that there is a potential misuse of PII data.
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.	PII attribute read and write permissions are role based and roles are reviewed by the development team and CDC Business and Security Stewards through each increment of development to determine that the appropriate roles have least privilege permission to access PII. Accuracy and relevancy is at the discretion and responsibility of individual recipients according to grant request needs. CDC conducts annual reviews of grant applications to identify any issues or discrepancies that need to be addressed.
PIA - 17:	Identify who will have access to the PII in the system.	Users
		Administrators
PIA - 17A:	Select the type of contractor.	
PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	
PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Users: CAMP(Recipient) Users will have access to propagate their own identifying attributes and review case status.
		Administrators: CAMP Administrators (CDC) will have access in order to perform support and evaluate records and cases for program management, evaluation and monitoring.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The ELC program will coordinate with CDC and/or recipient health departments to determine PII access needs upon user application for access to ELC CAMP.
PIA - 20:	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.	PII visibility in the platform is enforced through role definition and role management. Roles were evaluated and defined in coordination with the CDC project manager/business steward and implemented in the ELC CAMP system.
		The Least Privilege model is used to allow those with access to PII to only access the minimum amount of

information necessary to perform their job.

Technical controls to ensure least privilege include creation and monitoring of audit logs, configuring access authorizations, and configuration system configurations and parameters to prevent non-authorized personnel from disabling, circumventing, or altering security safeguards.

PIA - 21: 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.

HHS and CDC personnel are required to take annual security awareness training related to review, use, and dissemination of sensitive data including PII.

PIA - 22: Describe training system users receive (above and beyond general security and privacy awareness training).

The ELC team is responsible for additional training, providing instructional usage documentation and training for end users on the CAMP platform. Training is developed to train end users, including the user manual, job aids, design documents, and other artifacts that will be communicated via email and shared through the Knowledge Portal within ELC CAMP. The frequency of this training is Annually.

PIA - 23: 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).

Records are maintained in accordance with National Archives and Records Administration (NARA) General Records Schedule (GRS) 2.1, Item 020, Position descriptions. Deletion privileges are limited to ELC CAMP administrators only.

Retained and destroyed according the CDC Records and Retention policy. The applicable records schedules appear below:

Non-electronic records manually entered: (GRS 5.2 020 Intermediary records

Final Reports: Permanent (CDC, RCS B-321)

Significant interest: 20 years

PIA - 24: Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.

Administrative: Access is granted to only a limited number of CDC program staff or its contractors, as authorized by the system owner to accomplish the stated purposes for which the data in this system have been collected.

Physical Safeguards: Access to the CDC facility where the databases are located is controlled by a cardkey system. Access to the computer room is controlled by a cardkey and security code (numeric keypad) system. Access to the data entry area (with CDC program staff) is also controlled by a cardkey system. Hard copy records are kept in locked cabinets in locked rooms. Security guard service in buildings provides personnel screening of visitors.

Technical: Security packages are implemented on CDC's servers to control unauthorized access to the system. Servers are located offsite from program staff and maintained by AHB (Application Hosting Branch). Protection for computerized records on the AHB servers includes programmed verification of valid user identification code and password prior to logging on to the system, mandatory password changes, limited logins, virus protection, and user rights/file attribute restrictions. Password protection imposes username and password log-in requirements to prevent unauthorized access. Each username is assigned limited access rights to files and directories at varying levels to control file

sharing. There are routine daily backup procedures and secure off-site storage is available for backup files.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	**Privacy Analyst Review Date:**	11/9/2023
Privacy Analyst Comments:	JO/BW, Not sure why this was rejected by the Agency Privacy Analyst. Their comment says its ready for approval but that two corrections need to be made to the PTA, which is not possible.	**Privacy Analyst Days Open:**	

SOP Review

SOP Review Status:	Approved	**SOP Signature:**	JWO Signature.docx
SOP Comments:	Approved on behalf of Beverly Walker. Please see PA Comment.	**SOP Review Date:**	11/28/2023
		SOP Days Open:	21

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	**Agency Privacy Analyst Review Date:**	12/4/2023
Agency Privacy Analyst Review Comments:	Reviewer: Jim Laskowski This PIA is ready for SAOP review and approval.	**Agency Privacy Analyst Days Open:**	6

SAOP Review

SAOP Review Status:	Approved	**SAOP Signature:**	
SAOP Comments:		**SAOP Review Date:**	12/12/2023
		SAOP Days Open:	8

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 11B	BANKS, Quentin	6/8/2023	Please define the acronyms on their first use: NCEZID Please remove Salesforce and replace it with third party vendor.	
PIA - 11D	BANKS, Quentin	6/8/2023	Please define the acronyms on their first use: SOP	