

Privacy Impact Assessment Form

v 1.21

Status

Form Number

Form Date

05/06/24

Question

Answer

1 OPDIV:

CDC

2 PIA Unique Identifier:

PRA-0920-2127

2a Name:

Adolescent Mental Health Journey Mapping Project

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.

Implementation

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

Public Health Analyst

POC Name

Hallie Carde

POC Organization

CDC/DDNID/NCIPC/OD

POC Email

rcu6@cdc.gov

POC Phone

803-920-0469

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

8c	Briefly explain why security authorization is not required	This is an electronic data collection
10	Describe in further detail any changes to the system that have occurred since the last PIA.	N/A
11	Describe the purpose of the system.	As a response to the national emergency for children and adolescent mental health declared in 2022, CDC's National Center for Injury Prevention and Control's (NCIPC) Office of Policy and Partnerships (OPP) is looking to better understand the mental health experiences of adolescent youth (ages 13-17) identifying as girls/female or nonbinary living in rural areas of New Mexico, Montana, and North Carolina. We will not explicitly be asking youth about any traumatic experiences. This project is formative in nature and intended to guide CDC's programmatic planning to address adolescent mental health needs in the US. The questions focus on identifying trusted resources and building resiliency for teens through social support systems, coping skills, and mental health literacy. The data will be collected through interviews, focus groups, and brainstorming sessions.
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>Prior to the interviews, focus groups, and brainstorming sessions, parent/guardian contact information, adolescent contact information, and adult mentor contact information (name and email address) will be collected in the screening process to send invitations to participants to join the sessions and share their compensation with them after the sessions.</p> <p>This project will include the collection of notes and audio recordings from the interviews, focus groups, and brainstorming sessions. All files will be de-identified and password protected. To further protect participant privacy, the project team will remind the participants to refer to themselves using only their first name or a fake name. These sessions will not collect PII.</p>

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

Parent/guardian contact information, adolescent contact information, and adult mentor contact information (name and email address) will be collected in the screening process to send invitations to participants to join the sessions and share their compensation with them after the sessions. The names and email addresses will be deleted at the completion of the project. Only the project team will have access to participant contact information.

The team will record only the audio of each session and store the recordings on a secure cloud-based Zoom Video Communications platform. The team will use the recording to make sure our notes are correct and to summarize what we hear across all groups. Only our project team will have access to these recordings, and the recordings will be deleted once our team updates the session transcription and notes. The session transcription and notes will be destroyed by or before September 2024. The written recording, written transcription, and session notes will not hold personally identifiable information of participants. At the end of in-person sessions, worksheets will be collected from participants to serve as design artifacts; individual identifying information will not be retained on any of these artifacts. The worksheets will be scanned, digitized, uploaded to the password-protected network storage location accessible only to the research team. Paper copies will be destroyed upon upload.

For the virtual sessions, a member of the Deloitte project team will join the Zoom meeting early and mark individuals as present as they enter the virtual waiting room. At the start of the sessions, participants will be renamed, provide verbal consent to be audio recorded and will be reminded they can leave at any time and will still receive compensation, what they share will not be shared outside of the group and will not be linked to their name (unless it indicates harm to self or others), and that they do not have to answer any question they do not want to answer.

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.	<div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> <input type="checkbox"/> Social Security Number <input checked="" type="checkbox"/> Name <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Mother's Maiden Name <input checked="" type="checkbox"/> E-Mail Address <input type="checkbox"/> Phone Numbers <input type="checkbox"/> Medical Notes <input type="checkbox"/> Certificates <input type="checkbox"/> Education Records <input type="checkbox"/> Military Status <input type="checkbox"/> Foreign Activities <input type="checkbox"/> Taxpayer ID <input type="text" value="Other..."/> <input type="text" value="Other..."/> <input type="text" value="Other..."/> </div> <div style="width: 50%;"> <input type="checkbox"/> Date of Birth <input type="checkbox"/> Photographic Identifiers <input type="checkbox"/> Biometric Identifiers <input type="checkbox"/> Vehicle Identifiers <input type="checkbox"/> Mailing Address <input type="checkbox"/> Medical Records Number <input type="checkbox"/> Financial Account Info <input type="checkbox"/> Legal Documents <input type="checkbox"/> Device Identifiers <input type="checkbox"/> Employment Status <input type="checkbox"/> Passport Number <input type="text" value="Other..."/> <input type="text" value="Other..."/> <input type="text" value="Other..."/> </div> </div>
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 <input type="text"/>
17 How many individuals' PII is in the system?	<input type="text" value="100-499"/>
18 For what primary purpose is the PII used?	Parent/guardian contact information, adolescent contact information, and adult mentor contact information (name and email address) will be collected in the screening process to send invitations to participants to join the sessions and share their compensation with them after the sessions. The names and email addresses will be deleted at the completion of the project.
19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	<input type="text" value="There are no secondary uses for the PII."/>
20 Describe the function of the SSN.	<input type="text" value="N/A"/>
20a Cite the legal authority to use the SSN.	<input type="text" value="N/A"/>
21 Identify legal authorities governing information use and disclosure specific to the system and program.	<input type="text" value="Public Health Service Act, Section 301, 'Research and Investigation' (42 U.S.C. 241)"/>
22 Are records on the system retrieved by one or more PII data elements?	<div style="text-align: right;"> <input type="radio"/> Yes <input checked="" type="radio"/> No </div>

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:

N/A

Published:

N/A

Published:

N/A

☐ 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.

OMB Control No: 0920-1154

ICR Reference No: 202210-0920-013

Expiration Date: 03/31/2026

24

Is the PII shared with other organizations?

☐ Yes

☒ No

24a

Identify with whom the PII is shared or disclosed and for what purpose.

☐ Within HHS

☐ Other Federal Agency/Agencies

☐ State or Local Agency/Agencies

☐ Private Sector

24b

Describe any agreements in place that authorizes the information sharing or disclosure (e.g. Computer Matching Agreement, Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).

N/A

24c

Describe the procedures for accounting for disclosures

N/A

<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>The last page of the screening survey asks for the potential participant's name and email address so the project team can follow up with a consent and scheduling form and a notice of when their session is. The last page provides a justification for the collection of contact information. For example, this is how it reads on the parental screening survey: "If your teen is selected to take part in a session, their time and efforts will help the CDC make better programs and services for teen mental health in the future. In order to contact your teen for a brief survey and assent (agreement) form, similar to this survey you just completed, please confirm your teen's contact information:"</p>		
<p>26 Is the submission of PII by individuals voluntary or mandatory?</p>	<p><input checked="" type="radio"/> Voluntary <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>Individuals who do not wish to share their name and email do not need to complete the screening survey and will not be considered for participation in a session. Participation in a session is completely voluntary and driven by individual interest.</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 changes expected to occur to the system. The screening survey will remain the same from start to finish of the data collection.</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>Individuals can reach out via email to the injuryctrengage@cdc.gov if they have a concern about the use of their PII.</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>In addition to regularly reviewing the spreadsheet output of the screening survey for eligible participants, the 1-2 contractor project team members will conduct a monthly review of the results of the screening surveys and remove any faulty or irrelevant data entries.</p>		
<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<p><input type="checkbox"/> Users <input type="checkbox"/> Administrators <input type="checkbox"/> Developers <input checked="" type="checkbox"/> Contractors <input type="checkbox"/> Others</p>	<p><input type="text"/> <input type="text"/> <input type="text"/> 1-2 direct contractor members on the project team with HHS badges and <input type="text"/></p>	
<p>32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>The contractor team and CDC team aligned on limiting access only to those who will be sending out follow-up/reminder communications and compensation information to session participants. Only 1-2 members of the contractor team will be sending those communications and scheduling the sessions, so those are the only people with access to the names and email addresses of interested participants.</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.	Names and emails will be collected through a survey system, where only 1-2 individuals on the contractor team will have access to the data. This system is housed within the Qualtrics tool, which is protected by Deloitte's Single Sign On login procedures and requires access to a VPN.	
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.	The contractor members of the project team have received their Collaborative Institutional Training Initiative (CITI) Human Subjects Research Certification and Deloitte's Confidential Information Management Plan training to prepare them for storage of the PII collected through the screening survey.	
35 Describe training system users receive (above and beyond general security and privacy awareness training).	While no additional training is required, self-guided training resources are available for users to operate the screening survey platform.	
<div> 36 Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices? <div> <input type="radio"/> Yes <input checked="" type="radio"/> No </div> </div>		

General Records Schedule (GRS) 3.2, Item 60, Public Key Infrastructure (PKI) Administrative Records.

PII will only be used to screen for, and to contact, respondents who match the specified respondent profile for the session. PII will be collected via a web-based survey application as part of the prescreening process. PII for each selected individual will be destroyed before the conclusion of this effort in September 2024. Individuals not selected for a session will not be contacted and their information will immediately be deleted. PII will not be retained or used to link respondents' individual comments during the session or during the analysis. All findings will be reported in the aggregate. PII will also not be used to describe the respondents in the room or to provide context to the analysis. Data are treated in a private manner, unless otherwise compelled by law. No paper documents with PII will be collected. Data containing PII will be disposed of as soon as session participants have been contacted and scheduled for sessions. Emails will be disposed of after the incentive has been sent to the participants. Participants will have the option to turn their Zoom camera on, but it will not be mandatory during any of the virtual sessions and only audio will be recorded for all sessions. Names of participants entering the Zoom group discussion will be changed to their first names only (last names will be removed) to protect the privacy of the individual.

Audio recordings and transcriptions will be stored on a secure, password-protected cloud storage. Audio will be recorded via Zoom and recordings will be encrypted and transcribed using Zoom's transcription mechanism which will only be used by the project team to validate the transcribed audio. Transcripts of the audio recordings will be de-identified prior and during analysis. Access to audio and de-identified transcript files is limited to authorized project team personnel only. Session audio files will be destroyed once the session has been transcribed including deleting files from the password-protected cloud and any local file storage. All staff and contractors working on the project agree to safeguard the data and not to make unauthorized disclosures. Responses in published reports are presented in aggregate form and no individuals are identified by name.

All consent forms include appropriate information about privacy, including purpose for collecting the data, with whom identifiable information will be shared, the voluntary nature of the information collection and the effect upon the respondent for not participating.

37 Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.

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

Administrative - The contractor members of the project team have received their CITI Human Subjects Research Certification and Deloitte's Confidential Information Management Plan training. Contractors will review monthly the results of the screening surveys and remove any faulty or irrelevant data entries. All PII is intended to be deleted at the end of the project and all other project data will be retained for 3 years from the conclusion of the project, per the initial Information Resources Board (IRB) feedback we received citing the code of federal regulations

Technical - The PII will be collected via a secure Qualtrics platform and will be uploaded to a secure password-protected folder shared between the 1-2 contractor team members that have access to the PII. The laptops used to access the survey tool that hosts the PII will be password protected, require two-factor authentication, and have the ability to be remotely erased in the very rare event that the laptops get lost or stolen.

Physical - Data will be stored in a secure AWS server building in Ashburn, VA, USA and the data will remain confidential.

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?	<input checked="" type="radio"/> Yes <input type="radio"/> No
	Reviewer Notes <input type="text"/>	
2	Does the PIA appropriately communicate the purpose of PII in the system and is the purpose justified by appropriate legal authorities?	<input checked="" type="radio"/> Yes <input type="radio"/> No
	Reviewer Notes <input type="text"/>	
3	Do system owners demonstrate appropriate understanding of the impact of the PII in the system and provide sufficient oversight to employees and contractors?	<input checked="" type="radio"/> Yes <input type="radio"/> No
	Reviewer Notes <input type="text"/>	
4	Does the PIA appropriately describe the PII quality and integrity of the data?	<input checked="" type="radio"/> Yes <input type="radio"/> No
	Reviewer Notes <input type="text"/>	
5	Is this a candidate for PII minimization?	<input type="radio"/> Yes <input checked="" type="radio"/> No
	Reviewer Notes <input type="text"/>	

Reviewer Questions		Answer
6	Does the PIA accurately identify data retention procedures and records retention schedules?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
7	Are the individuals whose PII is in the system provided appropriate participation?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
8	Does the PIA raise any concerns about the security of the PII?	<input type="radio"/> Yes <input checked="" type="radio"/> No
Reviewer Notes		
9	Is applicability of the Privacy Act captured correctly and is a SORN published or does it need to be?	<input type="radio"/> Yes <input checked="" type="radio"/> No
Reviewer Notes		
10	Is the PII appropriately limited for use internally and with third parties?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
11	Does the PIA demonstrate compliance with all Web privacy requirements?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Reviewer Notes		
12	Were any changes made to the system because of the completion of this PIA?	<input type="radio"/> Yes <input checked="" type="radio"/> No
Reviewer Notes		
General Comments		
OPDIV Senior Official for Privacy Signature		HHS Senior Agency Official for Privacy