

Copy PIA (Privacy Impact Assessment)

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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

General Information			
PIA Name:	CDC - NYTS - QTR1 - 2023 - CDC6656395	PIA ID:	6656395
Name of Component:	National Youth Tobacco Survey	Name of ATO Boundary:	National Youth Tobacco Survey
Overall Status:		PIA Queue:	
Submitter:	ALLEN, Cynthia	# Days Open:	93
Submission Status:	Re-Submitted	Submit Date:	4/3/2023
Next Assessment Date:	N/A	Expiration Date:	
Office:	DDNID	OpDiv:	CDC
Security Categorization:	Low		
Legacy PIA ID:		Make PIA available to Public?:	Yes
		History Log:	View History Log
1:	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance	
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	3/31/2023	

PTA		
PTA		
PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	Significant System Management Change
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	Changes to system operation environment and developmental tool from Voxco to Qualtrics; on-prem dedicated to a FedRAMP authorized cloud services. There are minor changes to a recently approved PIA data elements. These changes have been updated in this version PI A.
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.	National Youth Tobacco Survey (NYTS) system is an electronic survey system that collects and stores anonymous survey data. It is a national comprehensive survey to examine 6th through 12th grade students' behaviors, knowledge, and attitudes toward tobacco, and to measure shifts in behaviors and use of emerging products.

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 collects and maintains rudimentary responses of survey questionnaires from approximately 23,000 anonymous middle school and high school students annually. The survey is voluntary and students are asked about their behaviors, knowledge, and attitudes toward specific tobacco products (e.g., cigarettes, cigarillos, e-cigarettes, hookah/water pipes, smokeless tobacco, flavored tobacco), as well as questions related to exposure to how they obtain tobacco products and tobacco advertising. Additionally there are some social context questions to understand factors of tobacco usage and knowledge such as the Adolescent Discrimination and Distress Index (ADDI) and Neighborhood Environment Scale (NES). Some of the examples questions include: --"How old were you when you first tried cigarette smoking, even one or two puffs?" --"During the past 30 days, on how many days did you use any tobacco product(s)?" --Asks for age, sex, and grade level, for statistical analysis purposes only. --"There are plenty of safe places to walk or spend time outdoors in my neighborhood?" --"You were discourage from joining a club?"
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.	Survey responses are collected from middle school and high school students annually to understand their behaviors, knowledge, and attitudes toward tobacco products. Participants are asked about their behaviors, knowledge, and attitudes toward specific tobacco products (e.g., cigarettes, cigarillos, e-cigarettes, hookah/water pipes, smokeless tobacco, flavored tobacco), as well as questions related to exposure to how they obtain tobacco products and tobacco advertising. Additionally, there are some social context questions to understand factors of tobacco usage and knowledge such as the Adolescent Discrimination and Distress Index (ADDI) and Neighborhood Environment Scale (NES). Some of the examples questions include: --"How old are you?" --"How old were you when you first tried cigarette smoking, even one or two puffs?" --"During the past 30 days, on how many days did you use any tobacco product(s)?" --Asks for age, sex, and grade level, for statistical analysis purposes only. --"There are plenty of safe places to walk or spend time outdoors in my neighborhood?" --"You were discourage from joining a club?" These data are used by CDC to help design, implement, monitor, and evaluate CDC's programs for reducing tobacco use among youth. These data are not shared with other systems. Survey respondents: Students access the survey using a randomly generated access code that is uniquely assigned to them with no identifying information about the students collected or requested. Indirect contractor (Administrator): The system maintains authentication credential (user id and password) in a separate information system for four administrators to securely accessing the system for administration, development, and maintenance purposes
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?	No
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.	NYTS is an electronic survey data collection non-publicly accessible website. The web URL is only known to selected students grade 6th through 12th to access using a randomly generated PIN for providing responses.
PTA - 10:	Does the website have a posted privacy notice?	No
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?	No
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.	Email Address User Credentials Other - Free text Field - Age, Sex, Grade level
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Members of the public Vendors/Suppliers/Third-Party Contractors (Contractors other than 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?	PII is used to establish system access credential. Students access the survey using a unique access code that is associated with their school, and no identifying information about the students is collected or requested. Survey respondent's PII (age, sex, grade level) is collected for statistical analysis only but is not retrievable by PII element. Changes occurred in 2022: project awarded to a different indirect contractor for the redesign and rearchitecting using cloud-based tools. The updates to the survey data included changes to some of the value's name while adding some social context questions to understand factors of tobacco usage and knowledge such as the Adolescent Discrimination and Distress Index (ADDI) and Neighborhood Environment Scale (NES).
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	indirect contractor internal communication
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" (48 U.S.C.241).
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 Non-Government Sources Members of the Public
PIA - 10:	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes

PIA - 10A:	Provide the information collection approval number.	Existing OMB# 0920-0621 exp. 1/31/2024. A new submission is in place and pending approval.
PIA - 10B:	Identify the OMB information collection approval number expiration date.	1/31/2024
PIA - 10C:	Explain why an OMB information collection approval number is not required.	Existing OMB# 0920-0621 exp. 1/31/2024. A new submission is in place and pending approval.
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)).	N/A
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.	N/A-No process is in place. The system is only maintaining authentication system credential for administrators.
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.	N/A
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.	No option for administrators to opt-out of having their user credentials and emails used because it is required for their role. This information is necessary to establish an account in supporting the study and accessing the system. Respondents PII (age, sex, grade level) is optional multiple-choice selection value and only collected for statistical analysis.
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.	PII identified is an authentication credential for system administrator. There is no process in place to notify and obtain consent from the individuals when major changes occur to the system because those changes would require themselves as an administrator, to perform or take action. Respondents PII (age, sex, grade level) is optional multiple-choice selection value and only collected for statistical analysis.
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.	System administrator may send an email to their supervisor if issues arise. Respondents PII (age, sex, grade level) is optional multiple-choice selection value and only collected for statistical analysis.

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 identified is an authentication credential for system administrator. User accounts are reviewed annually. Respondents PII (age, sex, grade level) is optional multiple-choice selection value and only collected for statistical analysis.
PIA - 17:	Identify who will have access to the PII in the system.	Administrators Contractors
PIA - 17A:	Select the type of contractor.	Third-Party Contractor (Contractors other than HHS 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.	Indirect contractor is system administrator who has access to support the information system.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Indirect contractors managing NYTS are granted access by the system administrator based on the user's role as authorized by the project manager. These indirect contractors can view their own PII (email address) in the system.
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.	Role based access controls are in place to ensure the concept of "least privilege" is implemented. Based on the technical director and project director's assessment of each team member, the software administrator creates and implements access groups. the access group can include system administrator, data analyst, database administrator, and survey developer working on data validation, processing, etc. Each individual assigned to work on the project is assigned to a group associated with their role. Access rights are then derived from that role. The project directory structure is organized such that access to each group is restricted to one or more access groups, effectively ensuring that an individual's access to data containing PII is restricted only to areas pertaining to tasks the individual is required to perform.
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.	Indirect contractors are required to complete the Information Security Awareness Training (SAT) annually which covers all aspects of systems and data security and confidentiality. Systems and network staff with higher role and responsibilities are require to complete additional training on contingency plan and disaster recovery training on an annual basis.
PIA - 22:	Describe training system users receive (above and beyond general security and privacy awareness training).	None

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).	User accounts and associated PII are removed when no longer needed for access. The PII and user accounts are temporary administrative records and not subject to long term records retention.
		CDC Records Control Schedule GRS-24-13a PKI Administrative Records.
		User accounts are reviewed annually.
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.	PII identified is an authentication credential for system administrator.
		Administrative Controls: include a security plan, file back-up, least privilege, and training.
		Technical Controls: Only the system administrator will have access to the authentication credential. The users' credential will be encrypted at the database level.
		Physical Controls: include ID Badges, Key Cards, Security Guards, and Closed Circuit TV (CCTV) for servers.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	4/13/2023
Privacy Analyst Comments:		Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	JWO Signature.docx
SOP Comments:		SOP Review Date:	4/18/2023
		SOP Days Open:	15

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	4/25/2023
Agency Privacy Analyst Review Comments:	Reviewer: Shanai Shobowale This PIA is ready for approval and signature.	Agency Privacy Analyst Days Open:	7

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	
SAOP Comments:	Other responses in the PTA and/or PIA state that this system collects user credentials. However, PTA-5A says that "user credentials are maintained in a separate system (e.g., AD, AMS) and not collected or maintained by this system." If a system collects or maintains user credentials, the response to PTA-5A should be yes, even if some users authenticate to the system via a separate system. OpDivs can use PTA-5 or PTA-6 to explain how different users authenticate, the name of the separate system providing authentication for some users, and whether the authenticating system has its own PIA. As PTA responses cannot be revised once approved by the OpDiv SOP, these responses will need to be updated when directed by the CDC SOP.	SAOP Review Date:	5/3/2023
		SAOP Days Open:	8

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	BANKS, Quentin	2/10/2023	Please include all PII that's within this tool. Name, age, sex, and grade level are missing.	
PIA - 3	BANKS, Quentin	2/10/2023	Please confirm the accuracy of the number you selected. The last approved number had a higher number. If number is correct, when did the change occur? Why did the change happen?	
PIA - 13	BANKS, Quentin	2/10/2023	If this is true, then why is PIA-12 Voluntary? I recommend looking at the last approved PIA for reference.	
PIA - 17	BANKS, Quentin	2/10/2023	In the last approved PIA, administrators also had access to the PII. Why did their access end?	
PIA - 18	BANKS, Quentin	2/10/2023	Please include administrators as well in PIA-17.	
PIA - 1	BANKS, Quentin	3/28/2023	Nonresponsive. Please include all PII that's within this tool. Name, age, sex, and grade level are missing.	
PIA - 3	BANKS, Quentin	3/28/2023	Nonresponsive. Please confirm the	
PIA - 13	BANKS, Quentin	3/28/2023	Nonresponsive. The PII collected is not only from administrators but from middle school and high school students. Can these students opt out by not taking the survey? If so, then that's an op-out!	
PIA - 19	BANKS, Quentin	3/28/2023	Please remove the first sentence. That statement is not relevant for this question.	
PIA - 22	BANKS, Quentin	3/28/2023	What's the frequency of this training?	
PIA - 1	ALLEN, Cynthia	3/28/2023	The current system only collects user credentials (email address and	

pw) for system access. The old NYTS collected additional PII which is not collected in this version.

PIA - 3	ALLEN, Cynthia	3/28/2023	NYTS has been redesigned to reduce the need for individual user PII. NYTS will only contain PII on less 50 users for this data collection cycle. There will be 500-4,999 respondents who will access the survey through a URL provided in person.
PIA - 13	ALLEN, Cynthia	3/28/2023	Unlike the previous NYTS, middle and high school students do not enter PII into the system. The only PII in the system is that of the contractors conducting and managing the survey. The role of the contractor requires the use of PII to access the system. Therefore, contractors cannot opt out of providing their email address for system access.
PIA - 19	ALLEN, Cynthia	3/28/2023	Description has been updated.
PIA - 22	ALLEN, Cynthia	3/28/2023	Technical training on the use of NYTS is provided as needed. There is no additional security or privacy training provided or needed to utilize the low impact system.
PIA - 1	BANKS, Quentin	4/13/2023	.