


General Information		
PTA / PIA Name:	CDC - 1CDP - QTR1 - 2026 - CDC8818708	PTA / PIA ID: 8818708
Component Name:	CDC OPHDST 1 CDC Data Platform	Component Acronym: 1CDP
Is this for a sub-component?:	No	ATO Boundary Name: CDC OPHDST 1 CDC Data Platform
Overall Status:	Complete 	# of Days - Open: 109
Submitter:	BLACKBURN, Jason	Submit Date: 4/20/2026
Next Assessment Date:	04/26/2029	Expiration Date: 4/26/2029
Office:	DDPHSIS	OpDiv: CDC
Security Categorization:	High	PIA Required: Yes
Make PIA available to Public?:	Yes	
General 01:	Identify the Enterprise Performance Lifecycle Phase of the system.	Operations and Maintenance
General 02:	Is this a FISMA-Reportable system?	Yes
General 03:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
General 04:	ATO Date or Planned ATO Date.	8/15/2026
General 05:	Is the system or electronic information collection, agency or contractor operated?	Agency
History Log:	View History Log	

Privacy Threshold Analysis		
PTA 01:	Point of Contact (POC) Name	Jason Blackburn
PTA 01A:	POC Title and Organization	System Security and Privacy Officer (CDC\OCOO\OCIO\CSPO)
PTA 01B:	POC Email Address	qks3@cdc.gov
PTA 01C:	POC Phone Number	678-367-5354
PTA 02:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)

<p>PTA 02A:</p>	<p>Describe in further detail any changes to the system that have occurred since the last PIA.</p>	<p>This will be the first PTA/PIA since Data Collation and Integration for Public Health Event Response Software-as-a-Service (DCIPHER SaaS) was renamed to CDC OPHDST 1 CDC Data Platform (1CDP). OPHDST is the Office of Public Health Data, Surveillance, and Technology. System functionality and design have not changed. 1CDP was also recategorized as a High system to allow for future capabilities/changes.</p> <p>System of Records Notices (SORNs) were also updated. "09-20-0113 Epidemic Investigation Case Records" was rescinded and replaced by "09-90-2001 Records Used for Surveillance and Study of Epidemics, Preventable Diseases and Problems."</p> <p>Many new non-PII data types (like recall, laboratory characterization of antimicrobial resistance, company names, product descriptions, shipping invoices, inspection data and laboratory samples, and publicly available data such as maps, weather, Medicare/Medicaid, and Census data) have been added to the platform in support of ongoing projects to facilitate conducting routine public health surveillance and to support outbreak response management operations.</p>
<p>PTA 03:</p>	<p>Is the data contained in the system owned by the agency or contractor?</p>	<p>Agency</p>
<p>PTA 04:</p>	<p>Please give a brief overview of the purpose of the system by describing what the functions of the system are and how the system carries out those functions in support of HHS.</p>	<p>1CDP is a unified data platform built from DCIPHER SaaS/HHS Protect, based on Palantir Foundry (Palantir Federal Cloud Service FedRAMP authorization package). It supports both the day-to-day surveillance work of CDC programs and public health emergency response, including robust early warning capabilities and situational awareness. 1CDP provides the agency with centralized data assets, shared capabilities, workflows, products, program-specific capabilities and response capabilities. Within 1CDP, programs can manage their data assets, workflows, analytics and other capabilities to meet specific programmatic needs. Data are collected from other CDC information systems and from state, territory, local, and tribal (STLTs) public health departments concerning reportable disease data and health conditions.</p>
<p>PTA 05:</p>	<p>List and/or describe all the types of information that are collected, maintained, and/or shared by the system regardless of whether that information is PII and how long that information is stored.</p>	<p>1CDP will collect, maintain and store diverse types of data including epidemiological case data, laboratory test orders/results, outbreak and environmental investigations and any related supporting data, such as contact tracing, molecular data, population-based health information, and publicly accessible datasets. In addition, the system will collect surveillance and outbreak management data such as surveillance, outbreak, recall, laboratory characterization of antimicrobial resistance, company names, product descriptions, shipping invoices, inspection data and laboratory samples.</p> <p>1CDP will also collect publicly available data (e.g.,</p>

topography, maps, weather, Medicare, Medicaid, Census).

It will be necessary for some CDC programs and external users to input personal identifiable information (PII) in order to conduct regular and emergency business activities. The types of PII that may be collected include name, date of birth, employment status/history, email address (personal/business), mailing address (personal/business), phone numbers (personal/business), medical records, medical records number, patient identification (ID) number, passport number, employee ID number, and other health condition data (like free-text medical notes that may not necessarily be PII). Other non-PII data may also be collected, such as occupation, health status, and other health condition data.

The data contained in this platform, including PII, will be used to support and manage routine public health activities (e.g., surveillance, statistical analysis, research, etc.) and emergency event responses (e.g., outbreaks, disasters, etc.). Data will be used to describe relationships and trends between population health and various health conditions and/or risk factors, as well as to inform public health event response decisions and management. Analysis and visualizations will be included in various reports, presentations, dashboards, and websites.

Other identifiers may also be collected in the cases where STLTs and other organizations may use an identifier to identify their own users. Those identifiers are not necessarily PII and could include things like custom deidentified STLT patient IDs or codes for conditions.

The blanket answer is all of those data are collected to support program-specific needs for conducting routine public health surveillance and to support outbreak response management operations. These data may be held indefinitely as historical health records for analysis in-platform.

Since listing every data type in the 1CDP platform is impractical, here are some in-depth examples of the types of data gathered to support hosted programs:

CovidDistrict dataset (Fall 2020 used in this example) - CovidDistrictID, SchoolYear, InstitutionType, DistrictID, DistrictName, DistrictNCES, InstitutionID, SchoolNCES, SchoolName, Control, PhysicalCity, PhysicalState, Latitude, Longitude, Enrollment, OpenDate, TeachingMethod, SportsParticipation, OnlineInstructionIncrease, NetowrkInvestment, HardwareInvestment, StaffMaskPolicy, StudentMaskPolicy, StudentIllnessReturnPolicy, StudentIsolationArea, SchoolTemporaryShutdown, ParentOptOutClassroomTeaching,

LastVerifiedDate, and InsertDate.

Collaborative Bed Capacity Facility Snapshot - OrgID, ReportingDate, AllBeds, AllBedsOccupied, AllBedsUnoccupied, AllBedsOccupiedPct, AllBedsUnoccupiedPct, AdultTotalOccupied, AdultTotalUnoccupied, AdultTotalOccupiedPct, AdultTotalUnoccupiedPct, PedsTotalOccupied, PedsTotalUnoccupied, PedsTotalOccupiedPct, PedsTotalUnoccupiedPct, SurgeTotal, SurgeActiveTotal, SurgeActiveTotalOccupied, SurgeActiveTotalUnoccupied, SurgeActiveTotalOccupiedPct, SurgeTotalUnoccupiedPct, SurgeInactiveTotalUnoccupied, SurgeActiveICU, SurgeActiveICUOccupied, SurgeActiveICUUnoccupied, SurgeActiveICUOccupiedPct, SurgeActiveICUUnoccupiedPct, SurgeActiveNonICUTotal, SurgeActiveNonICUOccupied, SurgeActiveNonICUUnoccupied, SurgeActiveNonICUOccupiedPct, SurgeActiveNonICUUnoccupiedPct, AllEDTotal, AllEDCensusTotal, PedsEDCensusTotal, TotalEDAdmittedCensus, AdultEDAdmittedCensus, PedsEDAdmittedCensus, TotalEDAdmittedPct, AdultEDAdmittedPct, PedsEDAdmittedPct, AllICUBeds, AllICUOccupied, AllICUUnoccupied, AllICUUnoccupiedPct, AdultICUOccupied, AdultICUTotalOccupiedPct, AdultICUUnoccupied, AdultICUTotalUnoccupiedPct, PedsICUOccupied, PedsICUUnoccupied, PedsICUUnoccupiedPct, AllNonICUBed, AllNonICUOccupied, AllNonICUUnoccupied, AllNonICUUnoccupiedPct, AdultNonICUOccupied, AdultNonICUUnoccupied, AdultNonICUUnoccupiedPct, PedsNonICUOccupied, PedsNonICUUnoccupied, PedsNonICUUnoccupiedPct, BurnTotal, BurnOccupied, BurnUnoccupied, BurnOccupiedPct, BurnUnoccupiedPct, NegativePressureTotal, NegativePressureOccupied, NegativePressureUnoccupied, NegativePressureOccupiedPct, NegativePressureUnoccupiedPct, Date, DateString, Beds.

PTA 05A: Are user credentials used to access the system?

Yes, but the user credentials are maintained in a separate system (e.g., AD, AMS) and not collected or maintained by this system.

PTA 05C: Please identify the system that maintains the user credentials or controls access to this system.

Secure Access Management Services (SAMS) and CDC Active Directory (AD). SAMS and AD are separate systems with their own PIA.

PTA 06:	Describe why each type of information is collected, maintained, and/or shared by the system. Specify what information is collected about each category of individual.	<p>1CDP is a web-based data integration and management platform for use across CDC programs to collate, link, manage, analyze, visualize, and share data from multiple sources to facilitate data interpretation and to inform public health decisions. It collects, stores, and shares (as needed) epidemiological, surveillance, laboratory, environmental, emergency response, population health, and general statistical information. It also manages a repository of historic surveillance, outbreak, emergency event response and other collected data.</p> <p>All data contained in this platform (regardless of whether publicly available or gathered from data imports) will be used to support and manage routine public health activities (e.g., surveillance, statistical analysis, research, etc.) and emergency event responses (e.g., outbreaks, disasters, etc.). Data collected about any individual could be PII such as name, date of birth, employment status/history, email address (personal/business), mailing address (personal/business), phone numbers (personal/business), medical records, medical records number, patient identification (ID) number, passport number, employee ID number. Other non-PII data may also be collected, such as occupation, health status, and other health condition data that will also be used for routine public health activities and emergency event responses.</p> <p>All data pertaining to an individual (PII or not) may also be used to describe relationships and trends between population health and various health conditions and/or risk factors, as well as to inform public health event response decisions and management. Analysis and visualizations will be included in various reports, presentations, dashboards, and websites. 1CDP data will also be used to inform and support CDC policy decisions in support of our core mission of protecting Americans from infectious and non-communicable diseases and investing in innovation to prevent, detect, and respond to such public health threats.</p>
PTA 07:	Does the system collect, maintain, use, or share PII?	Yes
PTA 08:	Does the system include a website or online application?	Yes
PTA 08A:	Provide the URL(s).	https://1cdp.cdc.gov
PTA 08B:	Are any of the website or online applications accessible by the public (including publicly accessible log in pages)?	No

PTA 09:	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 1CDP URL serves as the sole user access point for the system. CDC internal users and external health partners have access to this URL. External users can only access the URL after SAMS authentication. Any CDC user logged into the CDC network has access to 1CDP.
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 12:	Does the website use web measurement and customization technology?	Yes
PTA 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	Session Cookies- Does Not Collect PII Persistent Cookies- Does Not Collect PII
PTA 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA 14:	Does the system have a mobile application?	No
PTA 20:	Are any third-party websites or applications (TPWA) associated with the system?	No
PTA 21:	Does this system use artificial intelligence (AI) tools or technologies?	Yes

PTA 21A:

What are the AI tools and how are they used?

1CDP uses the following AI tools that are part of the FedRAMP-authorized Palantir Federal Cloud Service ATO package:

GPT-4o - this is the main Large Language Model (LLM) used by 1CDP to support their Palantir AIP (Artificial Intelligence Platform) functionality. It is government-only. AIP is used in 1CDP for:

AIP Assist: LLM-powered support tool for real-time, context-aware assistance and "chat" functionality.

AIP Logic: No-code environment for creating, testing, and deploying AI-powered functions.

AIP Agent Studio: Tool for building interactive, LLM-powered agents that can automate workflows and interact with Ontology data.

AIP Evals: Framework for testing and evaluating LLM-based functions and prompts.

AIP Threads: Interface for ad-hoc LLM-powered document analysis and agent interaction.

GPT-4o Mini - this LLM is recommended for general use in AIP, especially for lightweight or high-volume tasks.

Llama 3.3 70b Instruct - Heavyweight version of Meta's open-source Llama 3.3 model, instruction tuned.

Other LLMs are available within the Palantir Federal Cloud Service boundary, but are not currently used by 1CDP. The Privacy Impact Assessment (PIA) will be updated to reflect any future AI use cases that introduce new privacy risks.

Privacy Impact Assessment

Privacy Impact Assessment

<p>PIA 22:</p>	<p>Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.</p>	<p>Identifying Numbers Passport Number Employee ID Number Biographical Information Name Date of Birth Employment Status/History Contact Information Email Address (Personal) Mailing Address (Personal) Phone Numbers (Personal) Email Address (Business) Mailing Address (Business) Phone Numbers (Business) Medical Information Medical Records Medical Records Number Patient ID Number Other Other</p>
<p>PIA 22A:</p>	<p>Identify the “other” type(s) of personally identifiable information (PII) not mentioned in the above list.</p>	<p>Free text fields - Medical Notes (not PHI)</p>
<p>PIA 23:</p>	<p>Indicate the categories of individuals about whom PII is collected, maintained, or shared.</p>	<p>Business Partners/Contacts (Federal state, local agencies) Employees/HHS Direct Contractors Patients</p>
<p>PIA 24:</p>	<p>Indicate the approximate number of individuals whose PII is maintained in the system.</p>	<p>500 – 4,999</p>
<p>PIA 25:</p>	<p>For what primary purpose is the PII used?</p>	<p>PII will be used to support and manage public health event responses and routine public health activities.</p>
<p>PIA 26:</p>	<p>Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).</p>	<p>PII will also be used to support research projects as authorized/ initiated by the respective programs that own the data. Further, data will be used to describe relationships and trends between population health and various health conditions and/ or risk factors, as well as to inform public health event response decisions and management.</p>

PIA 28:	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); sections 304, 306, and 308(d), which discuss authority to grant assurances of confidentiality for health research and related activities (42 U.S.C. 242 b, k, and m(d)); and section 361, "Quarantine and Inspection, Control of Communicable Diseases (42 U.S.C. 264).
PIA 29:	Are records in the system retrieved by one or more PII data elements?	Yes
PIA 29A:	Please specify which PII data elements are used to retrieve records.	Name, Medical Record Number
PIA 29B:	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.	CDC SORN Number 09-20-0106 Specimen Handling for Testing and Related Data 09-20-0136 Epidemiologic Studies and Surveillance of Disease Problems 09-20-0171 Quarantine-and-Traveler-Related Activities, Including Records for Contact Tracing Investigation and Notification under 42 CFR Parts 70 and 71 HHS SORN Number 09-90-2001 Records Used for Surveillance and Study of Epidemics, Preventable Diseases and Problems
PIA 30:	Identify the sources of PII in the system.	Government Sources Within the OPDIV Other HHS OPDIV State/Local/Tribal Other Federal Entities
PIA 31:	Is there an Office of Management and Budget (OMB) information collection approval number?	No
PIA 31B:	Explain why an OMB information collection approval number is not required.	An OMB Collection Approval number is not needed here because no PII is sourced from the public.
PIA 32:	Is the PII in the system shared directly with other organizations outside the system's Operating Division?	Yes
PIA 32A:	Identify with whom the PII is shared or disclosed.	Other Federal Agency/Agencies State or Local Agency/Agencies Within HHS

PIA 32B:	For each disclosure, name the organizations/systems the system shares PII with and the purpose(s) of the disclosure.	Within HHS- To support and manage public health event responses and routine public health activities at the state/local/tribal level. Other Federal Agency/Agencies- To support and manage public health event responses and routine public health activities at the federal level. State or Local Agency/Agencies- To support and manage public health event responses and routine public health activities at the STLT level.
PIA 32C:	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)).	1CDP utilizes Data Use Agreements (that define system to system connections) and Program Engagement Agreements (that define the program-to-program responsibilities and relationships) with the various systems and program providing data to 1CDP. These agreements place responsibility with the program to manage their own data, and share appropriately with STLTs based on the policies, procedures, and agreements in place within the participating program.
PIA 32D:	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.	Data disclosures ("data export events") to and from 1CDP are tracked by the audit/traceability functionality provided within 1CDP. Every run (successful or not) of any data connection is logged and can be reviewed in the Data Connection Module.
PIA 33:	Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?	Voluntary
PIA 34:	Describe the method in place to notify and obtain consent from individuals whose PII will be collected. If no prior notice is given or consent cannot be obtained, explain why.	1CDP receives its information from other systems, and those source systems are responsible for providing methods for individuals to opt out of the collection or use of their PII.
PIA 35:	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). If they cannot be notified or have their consent obtained, explain why.	PII data are collected by State/Local/Tribal Public Health Departments and are submitted to CDC in support of public health surveillance, investigation, and response activities. In the event a major system change significantly alters the disclosure and/or use of PII maintained in the system, 1CDP will notify the participating CDC programs and external partners, with whom we exchange data and maintain Data User Agreements and Program Engagement agreements, of the change so they can take appropriate action to notify their program partners, such as STLTs, and obtain consent from the affected individuals.

<p>PIA 36:</p>	<p>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.</p> <p>If no process exists, explain why not.</p>	<p>To report and resolve concerns, individuals can contact the 1CDP Helpdesk (1cdp@cdc.gov), who will notify the relevant program lead or any other personnel required to address the issue. The communication should reasonably identify the record and specify the information being contested, the corrective action sought, and the reasons for requesting the correction, along with supporting information to show how the record is inaccurate, incomplete, untimely, or irrelevant.</p>
<p>PIA 37:</p>	<p>Describe the process in place for periodic reviews of the system to ensure the integrity, availability, accuracy, and relevancy of the PII in the system. Please address each element in your response.</p> <p>If no processes are in place, explain why not.</p>	<p>1CDP provides participating CDC programs and external partners with an interface to review all data and PII and programs/external partners can conduct their own reviews as needed or as consistent with their existing policies. This program responsibility, including the reminder that the program is responsible for these periodic audits, is written into the 1CDP Program Engagement Agreement, signed by the participating programs, as a responsibility delegated to the participating programs and is further codified in the Data Use Agreement that each program lead signs as part of the on-boarding process for 1CDP.</p>
<p>PIA 38:</p>	<p>Identify who will have access to the PII in the system.</p>	<p>Users Administrators Developers Contractors Others</p>
<p>PIA 38A:</p>	<p>Select the type of contractor.</p>	<p>HHS/OpDiv Direct Contractors</p>
<p>PIA 38B:</p>	<p>Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?</p>	<p>Yes</p>
<p>PIA 38C:</p>	<p>Identify the additional person(s) who will have access to the PII in the system not mentioned in the list above.</p>	<p>Others - State/local/tribal users.</p>
<p>PIA 39:</p>	<p>Provide the reason why each of the groups identified in 38 needs access to PII.</p>	<p>Users- Program users will need access to the PII in their specific data sources in order to carry out their regular job duties. Administrators- Administrators will need to assist in mapping incoming data into the platform. Developers-Developers will need to appropriately map incoming data into the platform, perform validation checks, and build ontology. Contractors -Contractors are used on this project for design, development, configuration, customization and maintenance. Other- State/local/tribal users who are owners of PII will need to access their data in order to carry out their regular job duties.</p>

PIA 40:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	System user access to PII is determined and managed by role-based system access, audit trail, and traceability. No access to PII or other data is allowed without the data steward/owner of the dataset manually granting access.
PIA 41:	Describe the technical methods in place to allow those with access to PII to access only the minimum amount of information necessary to perform their job.	1CDP utilizes a model that allows CDC administrators to assign individual security labels and permissions to every piece of data ingested into the platform at the object, property, and relationship level. CDC administrators create unique profiles for each user and assign users to groups and subgroups and determine controls and clearance levels associated with each user and group based on the least privileged model. Requests for access to any dataset in the 1CDP platform must be granted by the owning data steward for the program operating in 1CDP.
PIA 42:	Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) to make them aware of their responsibilities for protecting the information being collected and maintained.	All CDC employees, contractors and fellows are required to complete Privacy and Security Awareness Training on an annual basis.
PIA 43:	Describe the training system users receive above and beyond general security and privacy awareness training.	All 1CDP users receive annual Role-Based Training for the platform per CDC policy, and extensive voluntary training is available on every aspect of 1CDP within platform (development, task-based training, platform capabilities, and other interactive eLearning topics).
PIA 44:	Describe the process and guidelines in place for the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).	Processes and guidelines with regard to the retention and destruction of PII varies and is dependent upon the individual systems from which the data comes. Each program using 1CDP is responsible for applying its own existing records retention schedules to PII data, and schedules will vary across programs. This program responsibility as to following their defined records retention procedures is written into the Program Engagement Agreement (PEA) that each program lead signs as part of the on-boarding process for 1CDP which identifies the participating program as responsible (and not 1CDP) for any and all retention-related requirements with respect to their data. 1CDP can be further configured to support automated and semiautomated deletions in accordance with program requirements as laid out in the PEA.

PIA 45:

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

Administrative Controls: PII is secured in the system via FISMA compliant Management, Operational, and Technical controls documented in the system security plan and authorization package. Management Controls include Federal, HHS, and CDC-specific Privacy, Risk Assessment, and Incident Management Policies, as well as annual system privacy impact assessments; maintaining security & privacy incident response procedures; and mandatory annual security & privacy awareness training. Technical Controls: Technical controls include application-level role-based access controls; column and row level data security; server audit and accountability measures; encryption of PII at rest and in transit; and adherence to organizationally defined minimum security controls including anti-virus and adherence to period system software security tests. Access to any dataset in 1CDP must be manually granted by the owning data steward. Physical Controls: Physical controls include security guards at every facility, and physical facilities management by restricting access to the data center to authorized personnel. Details about physical controls (not for CDC facilities or users) for the Palantir Federal Cloud Service FedRAMP package are available on request by using a FedRAMP Package Access Request Form.

Review and Comments

OpDiv Privacy Analyst Review

Privacy Analyst Review Decision:	Approved	Privacy Analyst Review Date:	4/20/2026
Privacy Analyst Review Comments:	Please refer to the comments dated 4/20/2026.	# of Days - PA Review:	0

SOP Review

SOP Review Decision:	Approved	SOP Review Date:	4/21/2026
SOP Review Comments:	Approve on behalf of Beverly Walker	# of Days - SOP Review:	1

SOP Signature

Date	User	Type	Name	Original Value	New Value
4/21/2026 2:47 PM	OSHODI, Jarell	Signature	SOP Signature (Email PIN)		Content Signed

Agency Privacy Analyst Review

Agency Privacy Analyst Review Decision:	Approved	Agency Privacy Analyst Review Date:	4/23/2026
Agency Privacy Analyst Review Comments:	Reviewer: Godisgreat Peters 4/23/2026 This PIA is ready for SAOP review and approval.	# of Days - APA Review:	2

SAOP Review

SAOP Review Decision:	Approved	SAOP Review Date:	4/27/2026
SAOP Review Comments:		# of Days - SAOP Review:	4

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
1CDP - Baseline System Information (April 2026).docx	2445270	.docx	4/16/2026 2:16 PM	0

Comments

Question Name	Submitter	Date	Comment	Attachment
PTA 02A	Lemon, Loretta	3/10/2026	First use, " DCIPHER SaaS" and "OPHDST", please spell out.	
PTA 05	Lemon, Loretta	3/10/2026	Please confirm the following information/data types, as they are not identified in the BSI Section 3. Please identify all of the information/date types and update	

as needed, the information/data types must MATCH in PTA-5 and the BSI Section 3.

"Types of data including epidemiological case data, laboratory test orders/results, outbreak and environmental investigations", "name, date of birth, sex, gender, contact information, ethnicity, and race), social security number, passport number, medical records, patient ID number, occupation, health status, and other health condition data.", etc.

PTA 05	Lemon, Loretta	3/10/2026	Section 2 #3 of the BSI is selected that no Social Security Number is collected, stored, or processed; however, this response stated that social security numbers are collected. Please confirm and update the documents where needed.
PTA 05C	Lemon, Loretta	3/10/2026	n/a
PTA 06	Lemon, Loretta	3/10/2026	<p>Please describe the following information/data types, as they are not identified in the BSI Section 3. Please describe all of the information/date types. All of the information/data types must MATCH in PTA-5, PTA-6, and the BSI Section 3.</p> <p>"Types of data including epidemiological case data, laboratory test orders/results, outbreak and environmental investigations", "name, date of birth, sex, gender, contact information, ethnicity, and race), social security number, passport number, medical records, patient ID number, occupation, health status, and other health condition data.", etc.</p>
PTA 21A	Lemon, Loretta	3/10/2026	Please add "The Privacy Impact Assessment (PIA) will be updated to reflect any future AI use cases that introduce new privacy risks." to this response.
PTA 21A	Lemon, Loretta	3/10/2026	Please remove bullets, stars and asterisks as this is better for 508 compliances.
PIA 22	Lemon, Loretta	3/10/2026	Please validate the PII data types, as this response has identified PII that has not been listed in PTA-5 and the BSI Section 3. ex. Employees ID

number, Medical Records, Mailing address (business), etc. Please update as needed to include all of the PII.

•

PIA 36	Lemon, Loretta	3/10/2026	First use, "POC " please spell out. Additional please identify who the contact is, or the office to be contacted, or the email address of the contact/office, or the help support number. ex. Privacy Office 1-800-000-000.
PIA 43	Lemon, Loretta	3/10/2026	Please define how often the Role Based Training is completed.
PTA 05	Lemon, Loretta	3/11/2026	Please provide examples of what "Other identifiers" consist of in this response. Regardless of PII or not
PTA 06	Lemon, Loretta	3/11/2026	Please identify what "other collected data." consist of in this response. Note: Privacy should be aware of all of the information/data types that are collected within the system.
PTA 05	Lemon, Loretta	3/11/2026	Please list what "other health condition data." consist of within this response. Note: Privacy Office should be made aware of all information/data types that are collected in the system.
PIA 22	Lemon, Loretta	3/11/2026	Please confirm all of the PII "Employee ID Number", "Employment Status/History", "Email Address, (Personal/Business), "Mailing Address (Personal/Business)", "Phone Number (Personal/Business)" as these information/data types are missing in the PTA-5 response. Please validate and add them to PTA-5. All PII must also be identified in the BSI Section3 and PTA-5. • • • • •
PTA 05	Lemon, Loretta	3/11/2026	Please confirm "occupation, health status, and other health condition data." These information/data types are missing from the BSI Section 3.

Please update as needed.

PTA 06	Lemon, Loretta	3/11/2026	Again, please specifically explain or describe all of the information/data types that are listed in PTA-5.
PTA 02A	Lemon, Loretta	4/16/2026	<p>In accordance with the previously approved PTA, the following highlighter data types that are stated in PTA-5 are not listed in the previously approved PTA.</p> <p>"In addition, the system will collect surveillance and outbreak management data such as surveillance, outbreak, recall, laboratory characterization of antimicrobial resistance, company names, product descriptions, shipping invoices, inspection data and laboratory samples.</p> <p>1CDP will also collect publicly available data (e.g., topography, maps, weather, Medicare, Medicaid, Census). Also "patient ID number, employee ID number"</p> <p>Please explain why these data types are new to the system or why the change occurred to add the data types.</p>
PTA 05	Lemon, Loretta	4/16/2026	Unfortunately, I do not have edit/update access to make this correction. Please spell out "ID" in patient ID number, first use.
PTA 06	Lemon, Loretta	4/16/2026	<p>1.The first paragraph of this response does not address the question. (Describe why each type of information is collected, maintained, and/or shared by the system). The green highlighted text is great to use with data types as applicable, please add to this response.</p> <p>1CDP will collect or use epidemiological case data, laboratory test orders/results, outbreak and environmental investigations and any related supporting data, contact tracing, molecular data, population-based health information, and publicly accessible datasets for what reason? In addition, the system will collect surveillance and outbreak management data such as surveillance, outbreak, recall, laboratory characterization of antimicrobial resistance, company names, product descriptions,</p>

shipping invoices, inspection data and laboratory samples **for what reason.**

1CDP will also collect publicly available data (e.g., topography, maps, weather, Medicare, Medicaid, Census) **for what reason?**

It will be necessary for some CDC programs and external users to input PII in order to conduct regular and emergency business activities. The types of PII that may be collected include name, date of birth, employment tatus/history, email address (personal/business), mailing address (personal/business), phone numbers (personal/business), medical records, medical records number, patient ID number, passport number, employee ID number, and other health condition data (like free-text medical notes that may not necessarily be PII). Other non-PII data may also be collected, such as occupation, health status, and other health condition data **for what reason?**

The data contained in this platform, including PII, will be used to support and manage routine public health activities (e.g., surveillance, statistical analysis, research, etc.) and emergency event responses (e.g., outbreaks, disasters, etc.). Data will be used to describe relationships and trends between population health and various health conditions and/or risk factors, as well as to inform public health event response decisions and management. Analysis and visualizations will be included in various reports, presentations, dashboards, and websites.

Other identifiers may also be collected in the cases where STLTS and other organizations may use an identifier to identify their own users. Those identifiers are not necessarily PII, and could include things like custom deidentified STLT patient IDs or codes for conditions

Example Language for the list of examples: The provided examples of the types of data gathered is used to support hosted programs with managing routine public health activities.

2. These data types are not listed in

PTA-5, "personal identity, logistics". Please confirm or add to PTA-5 and describe the "WHY" used in this response.

PIA 29B	Lemon, Loretta	4/16/2026	In accordance with the previous PIA, "09-20-0113-Epidemic Investigation Case Records, 09-20-0136 Epidemiologic Studies and Surveillance of Disease Problems" was stated. Please explain why this SORN is no longer applicable in PTA-2A.
PTA 05C	Lemon, Loretta	4/20/2026	Please add "AD and SAMS are separate systems with their own PIA".
PTA 06	Lemon, Loretta	4/20/2026	<p>1.The reference to PTA 05 in this response cannot be grouped together since there is personal data, medical data, public health activities, etc. You can describe them in categories of data, such as medical data, personal data, etc.</p> <p>The question asks, "Describe why each type of information is collected, maintained, and/or shared by the system. Specify what information is collected about each category of individual."</p>
PTA 04	Data Feed Service, Privacy Assessment OpDiv to HHS	4/23/2026	Please describe to the best of your ability, any known AI use cases. Please include "The Privacy Impact Assessment (PIA) will be updated to reflect any future AI use cases that introduce new privacy risks."
PIA 29B	Data Feed Service, Privacy Assessment OpDiv to HHS	4/23/2026	<p>Per CDC's Email:</p> <p>CDC SORN Number</p> <p>09-20-0106 Specimen Handling for Testing and Related Data 09-20-0136 Epidemiologic Studies and Surveillance of Disease Problems</p> <p>09-20-0171 Quarantine-and-Traveler-Related Activities</p>