

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

03/26/2020

**OPDIV:**

CDC

**Name:**

DCIPHER WHR (DCIPHER WHR)

**PIA Unique Identifier:**

P-2313319-544269

**The subject of this PIA is which of the following?**

General Support System (GSS)

**Identify the Enterprise Performance Lifecycle Phase of the system.**

Initiation

**Is this a FISMA-Reportable system?**

No

**Does the system include a Website or online application available to and for the use of the general public?**

No

**Identify the operator.**

Agency

**Is this a new or existing system?**

New

**Does the system have Security Authorization (SA)?**

No

**Describe the purpose of the system.**

Data Collation and Integration for Public Health Event Responses White House Reporting (DCIPHER WHR) is a cloud-based platform used across CDC programs, in the Emergency Operations Center (EOC), by other federal partners, and by state, local, tribal, and territorial public health jurisdictions to collect, collate, share, and link multiple sources of public health, outbreak, and event response data. It is designed to facilitate data interpretation and to inform public health decisions.

**Describe the type of information the system will collect, maintain (store), or share.**

DCIPHER WHR is a consolidated platform that integrates, manages, analyzes, visualizes and shares traditional and non-traditional data sets used to support the management of all-hazards public health event responses, surveillance, research, statistical, and other public health activities. This information represents diverse types of data including 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.

Data maintained by DCIPHER WHR also includes logistics management, emergency response, worker safety, policy and guidance, general purpose and statistics, as well as publicly available data (e.g., topography, maps, weather). In addition, the system maintains 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.

The system collects Patient name, Submitter names, Dates of Birth, Medical Record Numbers, Medical Notes, Contact Personal Phone Numbers, Email addresses, Mailing addresses, Passport Numbers, and Employment Status. The information is used to associate a specimen with a particular person.

Individuals are granted access to the system via authentication using the Secure Access Management System (SAMS). SAMS is a separate system with its own PIA.

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

DCIPHER WHR is a cloud-based data integration and management platform for use across CDC, in the Emergency Operations Center (EOC), by other federal partners, and by state, local, tribal, and territorial public health jurisdictions to: collate, link, manage, analyze, visualize, and share public health, outbreak, and event response data. It facilitates data interpretation and informs public health decisions.

DCIPHER WHR collects, stores, and shares (as needed) epidemiological, surveillance, laboratory, environmental, logistics, emergency response, population health, and general statistical information. The system collects Patient name, Submitter names, DOB, Medical Record Numbers, Medical Notes, Contact Personal Phone Numbers, Email addresses, Mailing addresses, Passport Numbers, and Employment Status. The information is used to associate a specimen with a particular person.

The data contained in this platform 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.). 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.

Data will be collected from a myriad of CDC systems (e.g., Enterprise Laboratory Information Management System (ELIMS), Quarantine Activity Reporting System (QARS), Division of Laboratory Sciences System Laboratory Information Management System (DLSSL), Data Collation and Integration for Public Health Event Responses (DCIPHER), Infectious Diseases Enterprise Laboratory Information management System (ID ELIMS), etc), each having its own PIA; external sources, including individual state, local, tribal, and territorial public health jurisdictions; and eventually, CDC anticipates interconnections directly to external systems, such as private laboratories, hospitals, insurers, other CDC-based emergency management and surveillance systems, and other federal agencies. The addition or removal of data sources and internal/external system interconnections will be based on existing need and revised PIA artifacts will be submitted accordingly.

Individuals are granted access through Secure Access Management Service (SAMS). Secure Access Management System SAMS is a separate system with its own PIA.

**Does the system collect, maintain, use or share PII?**

Yes

**Indicate the type of PII that the system will collect or maintain.**

Date of Birth

Name

E-Mail Address

Mailing Address

Phone Numbers

Medical Records Number

Medical Notes

Employment Status

Passport Number

**Indicate the categories of individuals about whom PII is collected, maintained or shared.**

Employees

Public Citizens

Business Partner/Contacts (Federal/state/local agencies)

Patients

**How many individuals' PII is in the system?**

1,000,000 or more

**For what primary purpose is the PII used?**

PII will be used to support and manage public health event responses and routine public health activities.

**Describe the secondary uses for which the PII will be used.**

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.

**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).

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

Yes

**Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.**

09-20-0106-Specimen Handling for Testing and Related Data

09-20-0136-Epidemiologic Studies and Surveillance of Disease Problems

09-20-0113-Epidemic Investigation Case Records

**Identify the sources of PII in the system.**

**Government Sources**

Within OpDiv

Other HHS OpDiv

State/Local/Tribal

Other Federal Entities

**Non-Governmental Sources**

Private Sector

**Identify the OMB information collection approval number and expiration date**

N/A: PII not being collected directly from the public.

**Is the PII shared with other organizations?**

Yes

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

null

**Other Federal Agencies**

To support and manage public health event responses and routine public health activities at the federal level.

**State or Local Agencies**

To support and manage public health event responses and routine public health activities at the state/local/tribal level.

**Describe any agreements in place that authorizes the information sharing or disclosure.**

DCIPHER WHR will have an MOU in place with CDC Center for Preparedness and Response (CPR) Personnel Workforce Management System (PWMS) that allows the sharing of information from PWMS to DCIPHER WHR.

DCIPHER WHR also has 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 DCIPHER WHR. These agreements place responsibility with the program to manage their own data, and share appropriately with states and locals based on the policies, procedures, and agreements in place within the participating program.

**Describe the procedures for accounting for disclosures.**

Data disclosures ("data export events") from DCIPHER WHR are tracked by the audit/traceability functionality provided within DCIPHER WHR .

**Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.**

N/A. DCIPHER WHR collects individuals PII from other systems. Therefore, it is the responsibility of the originating systems to provide notifications to individuals that their personal information is being collected.

**Is the submission of PII by individuals voluntary or mandatory?**

Voluntary

**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.**

DCIPHER WHR 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.

**Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.**

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, DCIPHER WHR 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 states, and obtain consent from the affected individuals.

**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.**

To report and resolve concerns, individuals can contact the POC listed in this form, who will notify the relevant program lead. 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.

**Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.**

DCIPHER WHR 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 DCIPHER 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 DCIPHER DHR .

**Identify who will have access to the PII in the system and the reason why they require access.**

**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, build ontology.

**Contractors:**

Indirect Contractors are used on this project for design, development, configuration, customization and maintenance.

**Others:**

State/local/tribal users who are owners of PII will need to access their data in order to carry out their regular job duties.

**Describe the 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.

**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.**

DCIPHER WHR 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.

**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.**

All CDC employees, contractors and fellows are required to complete Privacy and Security Awareness Training at least annually.

**Describe training system users receive (above and beyond general security and privacy awareness training).**

All DCIPHER WHR users receive Role-Based Training for DCIPHER WHR .

**Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?**

Yes

**Describe the process and guidelines in place with regard to the retention and destruction of PII.**

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 DCIPHER WHR 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 DCIPHER WHR Program Engagement Agreement (PEA) that each program lead signs as part of the on-boarding process for DCIPHER WHR which identifies the participating program as responsible (and not DCIPHER WHR ) for any and all retention related requirements with respect to their data. DCIPHER can be further configured to support automated and semi-automated deletions in accordance with program requirements as laid out in the PEA.

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

Administrative Controls:

PII is secured in the system via FISMA compliant Management, Operational, and Technical controls documented in the systems security 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 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.

Physical Controls include secured facilities; physical facilities management by restricting access to the data center to authorized personnel.