

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

02/12/2014

**OPDIV:**

CDC

**Name:**

Dating Matters Evaluation (DMEVal)

**PIA Unique Identifier:**

P-8100583-089952

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

Major Application

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

Operations and Maintenance

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

Yes

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

No

**Identify the operator.**

Contractor

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

New

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

No

**Indicate the following reason(s) for updating this PIA.****Describe the purpose of the system.**

Dating Matters: Strategies to Promote Healthy Teen Relationships™ is an initiative which will support community implementation of two models of TDV prevention: standard practice and a comprehensive approach to TDV adapted for use in high-risk urban communities (high-risk refers to communities with high rates of crime and economic disadvantage). In each of four funded sites schools will implement either the Dating Matters™ comprehensive approach, which includes student curricula, parent curricula, educator training, policy assessment and development, and a communications campaign, or the standard of care approach (Safe Dates for 8th grade students). The Evaluation component of the program (conducted by the Centers for Disease Control and Prevention, with NORC at the University of Chicago serving as the evaluation contractor) will examine the effectiveness of the Dating Matters™ comprehensive approach with the standard of care approach. The project will collect data through four years of longitudinal student surveys, school administrative data on disciplinary incidents and school climate, parent/caregiver surveys, educator and interventionist surveys, program monitoring/fidelity data, student and implementer focus groups, cost data on program implementation, and community indicator data

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

The system includes surveys conducted on three classes of respondents (students, parents, and educators), as well as focus group and course implementation reports. The surveys are treated in further detail below.

Student Surveys: There will be two waves of student surveys collected per year (paper-and-pencil) for four years (8 administrations) with approximately 12,000 eligible students per wave across all four sites. The surveys will cover measures of teen dating violence, as well as relevant correlates of teen dating violence (demographics, mental health, resilience, parental communication, parental monitoring, substance use, risky sexual behaviors, exposure to family and community violence, and school climate).

Parent Surveys: There will be two waves of parent surveys per year (web-based or paper-and-pencil) for four years (8 administrations). The surveys will cover measures of demographics, parenting behaviors, communications with partner and with study child, child's development, attitudes, gender role beliefs, and neighborhood characteristics.

Educator Surveys: Online surveys with the Educators (teachers, administrators, and other staff at participating schools) and Implementers of the student and parent curricula. The surveys will cover measures of demographics, attitudes, school norms and climate, and participation in the Dating Matters online educator training. NORC will administer five web-based surveys (one baseline survey and four follow up surveys), delivered via email link to all Educators and Implementers in participating schools. Surveys will be anonymous, identified by school only.

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

The system consist of a front end web server that is accessible from the Internet. The system is used to collect response data from the survey. All users must have login credentials to access the system. The web site is not available to the general public. All data is stored on an internal SQL server that is not accessible from the Internet.

**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

Vehicle Identifiers

Phone Numbers

Education Records

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

Public Citizens

Dating Matters program participants in funded school systems (Students and Educators) and parents of participating students, as detailed in Item 12.

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

10,000-49,999

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

Primary purpose for the use of the PII is to contact study participations and track/maintain longitudinal sample.

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

None

**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)

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

No

**Identify the sources of PII in the system.****Directly from an individual about whom the information pertains**

In-Persion

Hardcopy

**Government Sources****Non-Governmental Sources****Identify the OMB information collection approval number and expiration date**

0920-0941 Exp: 06-30-2015

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

No

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

Respondent assent/consent is obtained prior to data collection.

Parent must consent and students assent for participation in the survey. The educator survey requires the participant to also provide consent.

**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.**

Individual can decline to participate in the study altogether or withdraw their participation at anytime (if they want to opt-out after completing an earlier survey they just need to contact NORC via a toll-free project number or let the school principal know who will contact NORC).

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

If the system is changed, attempts would be made to contact individually by mail and phone.

**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.**

The individual can contact the project (via a toll-free project phone number) and the concerns would be investigated. The participant would then be contacted and told about the results of the investigation and steps that have been taken to safeguard their data.

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

PII collected during implementation and evaluation is stored in databases that are to be separate from those used to store survey information. Unique identifier codes are created and given to each student and parent participant; one tracking database contains the participants' personally identifiable information, one contain the participants' actual survey data identified only by the unique identifier code, and a third database contain the link between the participant identity (name and birthdate) and the unique identifier code. These data is collected and stored by the evaluation contractor (NORC) during the contract. Only selected individuals at NORC (e.g., database manager) and at CDC (PI and data manager) has access to the tracking database and the survey data database.

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

Necessary for tasks associated with all core study data collection and management processes.

**Contractors:**

Necessary for tasks associated with all core study data collection and management processes.

**Others:**

NORC Research staff require access to review survey data.

**Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.**

NORC implements access on the least privilege method. Only people who jobs requires access to the data are granted access. All users must be approved by the project director prior to access is granted.

**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.**

All access is granted through Active Directory. Individual Active Directory groups are created for each project. Only the project staff that require access are added to the project 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 NORC staff are required to complete company Ethic and Confidentiality training and Security Awareness training.

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

All Dating Matter project staff are required to sign the Dating Matters Rules of Behavior document and a non-disclosure agreement.

**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.**

Records are retained and disposed of in accordance with the CDC Records Control Schedule. Record copy of study reports are maintained in agency from two to three years in accordance with retention schedules. Source documents for computer are disposed of when no longer needed by program officials. Personal identifiers may be deleted from records when no longer needed in the study as determined by the system manager, and as provided in the signed consent form, as appropriate. Disposal methods include erasing computer tapes, burning or shredding paper materials or transferring records to the Federal Records Center when no longer needed for evaluation and analysis. Records are retained for 20 years; for longer periods if further study is needed.

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

During the study, data is secured through the use of technical, physical, and administrative controls. All data is stored in a secure datacenter with limited access. All access is via electronic card readers. The datacenter has special environment controls to monitor for disruption to electrical or air conditioner failure.

Servers and workstations are protected with anti-virus software. Their configuration follow the Computer Internet Security configuration and FDCC standard. Security patches are automated and applied at least monthly depending on the criticality of the patch. All systems have vulnerability scans performed monthly.

Data backups are encrypted and sent off site in case of disaster at the primary processing facility.

All publication of this data is in aggregate form. No respondent would ever be able to be identified from the information provided to the public at the aggregate level.