

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

09/04/2014

**OPDIV:**

OS

**Name:**

MedicalCounterMeasures.gov

**PIA Unique Identifier:**

P-2615470-028744

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

Minor Application (stand-alone)

**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?**

Yes

**Identify the operator.**

Contractor

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

Existing

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

Yes

**Indicate the following reason(s) for updating this PIA.**

PIA Validation

**Describe in further detail any changes to the system that have occurred since the last PIA.**

No changes.

**Describe the purpose of the system.**

MCM.gov website provides a central point to communicate with manufacturers of vaccines, drugs, therapies and diagnostic tools for public health medical emergencies.

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

MedicalCountermeasures.gov requires website visitors intending to conduct business with the government to register and create accounts for the purpose of submitting meeting requests and receiving responses. PII required and collected on the Registration form includes the user's First Name, Last Name, Position, Email Address, and Company Name.

User information requested and collected on Forms by the restricted, non-public accessible portion of MCM.gov include Requestor's Name, Business Phone Number, Business Email Address, and Business Fax Number. This information enables the Agency to contact companies to discuss product information submitted on MCM.gov.

All information submitted to MCM.gov is voluntarily and only provided to participating Federal agencies to manage requests for meetings and to respond to user initiated requests. Only government agency representatives with a direct stated interest in meeting with companies have access to such information.

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

MedicalCounterMeasures.gov is a website for private industry to use to submit information on products in development and to request meetings with participating government agencies to explore the product potential for countermeasure use.

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

Yes

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

Name

Business Phone, Business Fax, Business Address, & Business E-mail Address

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

Public Citizens

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

Vendor/Suppliers/Contractors

none

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

100-499

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

MedicalCountermeasures.gov collects information supplied on comment forms, forum registration, meeting request forms, and other submissions directly related to providing response to user requests.

Users are provided with an "agreement" screen authorizing information sharing by the Agency. Users check a "box" to denote agreement to information sharing between all government agencies necessary to conduct business. Company representatives' names and business contact information are shared with participating government agencies to facilitate meetings and discussions.

MedicalCounterMeasures.gov states that all the content and answers provided are the responsibilities of a number of interagency partners for the purpose of conducting government business.

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**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.**

Pandemic and All-Hazards Preparedness Re-authorization Act of 2013, PL-113-5 - reauthorized public health response programs. Project Bioshield Act of 2004, PL 108-276, to streamline procurement of biomedical countermeasures and biodefense activities. For example, this activity supports the requirement from the Project Bioshield Act for the Secretary to "devise plans for the effective and timely supply-chain management of the stockpile, in consultation with appropriate Federal, State and local agencies, and the public and private health care infrastructure" (PL 108-276, Sec. 3(a)(2), amending the Public Health Service Act at 319F-2 (a)(2)(E))

**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**

Online

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

0990-0323, expires 3.31.2014, renewal submission scheduled for Oct 2013

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

Yes

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

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

Memorandum of Understanding (MOU) signed by federal agency representatives that participate.

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

In the unexpected event of a non-routine disclosure, records are maintained that document to whom the information was released, what information was released and when. and this information can be provided to the individual upon request.

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

MedicalCounterMeasures.gov provides both a public oriented page for visitors browsing the web site and a restricted web page for users intending to conduct business with the Agency to provide their information and enable responses to their requests.

Information is collected by Forms submitted by requesters. By completing the Forms and providing all requested contact information needed to process their requests, users consent to be contacted for the purpose of conducting business with the government. See also the response to Question 18 for more information on the consent process.

**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.**

Information is collected by Forms submitted by requesters. By completing the Forms and providing all requested contact information needed to process their requests, users consent to be contacted for the purpose of conducting business with the government.

MedicalCounterMeasures.gov "Privacy Policy" is intended to assist users in deciding whether to provide their information or decline as well as provide update information regarding PII usage and changes to the Website.

The "Contact Webmaster" link at the bottom of the page provides both an email link and a phone number for users to notify the agency of any suspected misuse of their information.

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

No major changes that would affect the rights or interests of the subjects of any PII are expected. In the event that this were to occur, individuals could be contacted using the information they have supplied to the system.

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**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 "Contact Webmaster" link at the bottom of the page provides both an email link and a phone number for users to notify the agency of any suspected misuse of their information.

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

Through the required periodic conduct of System Certification & Accreditation (C&A) and the Annual Review process, the Agency ensures the integrity, availability, and accuracy and relevance of the information on MedicalCounterMeasures.gov.

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

Contact information for responding to users requests.

**Administrators:**

To administer the Website and provide response/resolution to users technical issues.

**Developers:**

For technical configuration, and maintenance of the data portion of the Website.

**Contractors:**

Contact information for responding to users requests.

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

Access is role-based, with strictly enforced Federal Information Security Management Act (FISMA) requirements, including minimum access level only to accomplish tasks.

**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.**

Authentication protocols are in place to ensure role-based access to minimal information. In addition, encryption certificates are used to protect information during the application and hosting infrastructure passed rigorous, third-party security test & evaluation in May 2013.

**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.**

Information Security Awareness Training and Privacy Awareness training is completed annually as per policy.

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

Application specific training is conducted for all new users before a login is issued. Federal agency users have clearly delineated role based training, for this specific application.

**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.**

Information within the request submission is kept on temporary basis until no longer needed as determined by the Government.

Records are accumulating under GRS 16, Item 5, Project Control Files. "Destroy 1 year after the year in which the project is closed." Project is closed when the product is licensed or withdrawn from consideration by the company. When the company file is destroyed, the information will be deleted.

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

All technical, administrative, and physical security safeguards implemented for the MedicalCounterMeasures.gov are detailed in the System Security Plan (SSP), Security Controls Catalogue (SCC), Information Technology Contingency Plan (ITCP), and SAS-70 (Hosting Facility Assessment) Report performed at the physical hosting facility/site (DYONYX)

**Identify the publicly-available URL:**

https://www.medicalcountermeasures.gov/

**Does the website have a posted privacy notice?**

Yes

**Is the privacy policy available in a machine-readable format?**

Yes

**Does the website use web measurement and customization technology?**

No

Other technologies that do not collect PII:

WebTrends measure software is used measure site traffic. No PII is tracked by this measurement tool.

**Does the website have any information or pages directed at children under the age of thirteen?**

No

**Does the website contain links to non- federal government websites external to HHS?**

No

**Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?**

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