

## Copy PIA (Privacy Impact Assessment)

Do you want to copy this PIA ?

Please select the user, who would be submitting the copied PIA.

## 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

<b>PIA Name:</b>	CDC - CBLS - QTR4 - 2023 - CDC7049970	<b>PIA ID:</b>	1736435
<b>Name of Component:</b>	CDC - Childhood Blood Lead Surveillance System	<b>Name of ATO Boundary:</b>	Childhood Blood Lead Surveillance System
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	137
<b>Submission Status:</b>	Re-Submitted	<b>Submit Date:</b>	2/2/2024
<b>Next Assessment Date:</b>	03/01/2027	<b>Expiration Date:</b>	3/1/2027
<b>Office:</b>		<b>OPDIV:</b>	CDC
<b>Security Categorization:</b>	Moderate	<b>OpDiv PIA ID:</b>	CDC7049970
<b>Legacy PIA ID:</b>		<b>Make PIA available to Public?:</b>	Yes
<b>1:</b>	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
<b>2:</b>	Is this a FISMA-Reportable system?		Yes
<b>3:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
<b>4:</b>	ATO Date or Planned ATO Date.		3/2/2024
<b>5:</b>	Is the system or electronic information collection, agency or contractor operated?		Agency

## PTA

PTA		
<b>PTA - 2:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	None
<b>PTA - 3:</b>	Is the data contained in the system owned by the agency or contractor?	Agency
<b>PTA - 4:</b>	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.	<p>The purpose of Childhood Blood Lead Surveillance (CBLS) system is to estimate the extent of elevated blood-lead levels among children, assess the follow-up of children with elevated blood-lead levels, examine potential sources of lead exposure, help allocate resources for lead poisoning prevention activities, and conduct national-level surveillance of lead exposure among the U.S. population of children under 16 years of age.</p> <p>The Childhood Blood Lead Surveillance (CBLS) system receives blood lead data from local and state governments, aggregates the data, and then uses it to estimate the extent of lead exposure among children, assess the follow-up of children with elevated blood lead levels, examine potential sources of lead exposure, and help allocate resources for lead poisoning prevention activities.</p>

<b>PTA - 5:</b>	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.	<p>The system collects, maintains, or shares the following categories of information:</p> <p>Demographic (date of birth, gender, ethnicity, race, city, county, state and zip code)</p> <p>Blood Lead Testing (lead concentration, drawn date, setting, etc.)</p> <p>Report (aggregate counts, concentrations, location, etc.)</p> <p>Users are authenticated using Active Directory (AD) via personal identity verification (PIV) card.</p>
<b>PTA - 5A:</b>	Are user credentials used to access the system?	
<b>PTA - 5B:</b>	Please identify the type of user credentials used to access the system.	
<b>PTA - 6:</b>	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.	<p>Demographic (date of birth, gender, ethnicity, race, city, county, state and zip code) and blood lead testing information (lead concentration, drawn date, setting, etc.) is about US citizens under 16 years of age. It is not collected by CDC but is collected and submitted by state and local governments. This information is created when individual blood lead tests are ordered in hospitals or other healthcare settings and reported to state and local lead poisoning prevention programs by statute. This data is periodically reported to CDC and processed through CBLS for analysis, aggregation and reporting by age and geography. This data is needed by CDC in order to determine the extent of lead poisoning, improve treatments, and prevent exposures.</p> <p>Report information (aggregate counts, concentrations, location, etc.) is derived by CDC from the demographic and blood lead testing information. It is aggregate information that is shared with states and localities that participate in the CBLS program. The report information is also shared with the public on the CDC Childhood Lead Poisoning Prevention Program's website in accordance with HHS/CDC Open Data Policy.</p>
<b>PTA - 7:</b>	Does the system collect, maintain, use or share PII?	Yes
<b>PTA - 7A:</b>	Does this include Sensitive PII as defined by HHS?	
<b>PTA - 8:</b>	Does the system include a website or online application?	Yes
<b>PTA - 8A:</b>	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	No
<b>PTA - 9:</b>	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.	<p>The website is designed for CDC staff to import, process, report, and analyze data collected from state and local recipient Lead Programs.</p> <p>It is only accessible on the CDC intranet.</p>
<b>PTA - 10:</b>	Does the website have a posted privacy notice?	Yes
<b>PTA - 11:</b>	Does the website contain links to non-federal government websites external to HHS?	No

<b>PTA - 11A:</b>	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
<b>PTA - 12:</b>	Does the website use web measurement and customization technology?	No
<b>PTA - 12A:</b>	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	
<b>PTA - 13:</b>	Does the website have any information or pages directed at children under the age of thirteen?	No
<b>PTA - 13A:</b>	Does the website collect PII from children under the age thirteen?	
<b>PTA - 13B:</b>	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?	
<b>PTA - 14:</b>	Does the system have a mobile application?	No
<b>PTA - 14A:</b>	Is the mobile application HHS developed and managed or a third-party application?	
<b>PTA - 15:</b>	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
<b>PTA - 16:</b>	Does the mobile application/ have a privacy notice?	
<b>PTA - 17:</b>	Does the mobile application contain links to non-federal government websites external to HHS?	
<b>PTA - 17A:</b>	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
<b>PTA - 18:</b>	Does the mobile application use measurement and customization technology?	
<b>PTA - 18A:</b>	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
<b>PTA - 19:</b>	Does the mobile application have any information or pages directed at children under the age of thirteen?	
<b>PTA - 19A:</b>	Does the mobile application collect PII from children under the age thirteen?	
<b>PTA - 19B:</b>	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?	
<b>PTA - 20:</b>	Is there a third-party website or application (TPWA) associated with the system?	No
<b>PTA - 21:</b>	Does this system use artificial intelligence (AI) tools or technologies?	No

### PIA

#### PIA

<b>PIA - 1:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Date of Birth Other - Free text Field - City, County, State, Zip Code, Gender, Race, Ethnicity.
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Patients Members of the public
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	The primary purpose of the PII is for childhood blood lead surveillance and analysis.

<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	A secondary use of PII is research and training.
<b>PIA - 6:</b>	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	N/A
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	N/A
<b>PIA - 7:</b>	Identify legal authorities governing information use and disclosure specific to the system and program.	The legal authorities governing the system's information use and disclosure are the Public Health Service Act, section 301, "Research and Investigation, " (42 U.S.C. 241); and Sections 304, 306, and 308(d) which discuss authority to maintain data and provide assurances of confidentiality for health research and related activities (42 U.S.C. 242 b, k, and m(d)).
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	No
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	
<b>PIA - 8B:</b>	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.	
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Government Sources State/Local/Tribal Non-Government Sources Members of the Public
<b>PIA - 10:</b>	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes
<b>PIA - 10A:</b>	Provide the information collection approval number.	OMB Number 0920-0931
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	7/31/2024
<b>PIA - 10C:</b>	Explain why an OMB information collection approval number is not required.	N/A
<b>PIA - 11:</b>	Is the PII shared with other organizations outside the system's Operating Division?	No
<b>PIA - 11A:</b>	Identify with whom the PII is shared or disclosed.	
<b>PIA - 11B:</b>	Please provide the purpose(s) for the disclosures described in PIA - 11A.	
<b>PIA - 11C:</b>	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	
<b>PIA - 11D:</b>	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.	
<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
<b>PIA - 12A:</b>	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	

<b>PIA - 13:</b>	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	Individuals have no means of opt-out of collection of PII. In jurisdictions where child blood lead data is collected lead test laboratory records must be reported to the state or local public health authority. States remove major identifying information from patient records and submit to CDC for aggregation, analysis and reporting.
<b>PIA - 14:</b>	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.	CDC does not have a process to notify and obtain consent from individuals in the event of a significant system change. CDC is not provided individual names or contact information by the state and local public health authorities. CBLS does not receive, collect, or store directly identifiable data; the limited potentially-identifiable data is not sufficient to be able to contact individuals.
<b>PIA - 15:</b>	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.	No process exists to resolve individual concerns because the data received by CDC is not linked to identifiable information. CDC is not provided individual names or contact information by the state and local public health authorities.
<b>PIA - 16:</b>	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.	System reviews are conducted quarterly to verify data integrity, accuracy, and relevancy.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Administrators
<b>PIA - 17A:</b>	Select the type of contractor.	
<b>PIA - 17B:</b>	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	
<b>PIA - 18:</b>	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Full access for data management and maintenance.
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Per a role-based access model, access to PII is restricted to authorized users as determined by contacting the system's business steward via email. The system Business Steward verifies the individuals with the job role or manager. The system on-boarding process ensures the individual requesting access has a need to know. furthermore, the system business Steward cross-checks the individual in the Centers for Disease Control and Prevention Global Address List. Only managers of the system are allowed to access PII in order to fulfill their job role.
<b>PIA - 20:</b>	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.	The least privilege model is applied to access PII. Least privilege provides the user with only those privileges which are essential to perform its intended job function. Managers can only access PII after having the managerial group permission associated to their account by the system Business Steward.

<b>PIA - 21:</b>	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.	All system administrators and users must undergo annual Security and Privacy Awareness Training. In addition, the user must read the Rules of Behavior for Use of HHS information resources and sign the accompanying acknowledgment.
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	All system administrators have extensive training and experience maintaining database management systems and employing best practices related to public health surveillance and reporting systems.
<b>PIA - 23:</b>	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).	Records are retained and disposed of in accordance with the CDC/Agency for Toxic Substances and Disease Registry (ATSDR) Records Control Schedule - Scientific and Research Project Record, Records Control Schedule (RCS), N1-442-09-01. Snapshot copies of Long-Term ongoing Studies data are transferred to the National Archives and Records Administration (NARA) in 1 year intervals (or other time period established with NARA); the first transfer to occur within the first year after the approval of Records Control Schedule. Copies of the completed database for completed Studies are transfer to NARA no longer than one year after the end of the project. Significant and or secondary research records are maintained at least eleven years, but no longer than twenty years, after the retirement of the system. Minor research records are maintained at least six years, but no longer than ten years, after the retirement of the system. If administrative usefulness has been met, research support records are disposed of immediately or maintain for no longer than five years, after retirement of system.

**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.

The PII in the system is secured using a layered approach with appropriate administrative, technical, and physical controls, being implemented.

The administrative controls educate system users of their responsibility to protect PII and legally bind them to do so. These controls include signed rules of behavior, non-disclosure agreements, CDC privacy and security awareness training, and records management training. Records are maintained according to CDC record control policies and procedures.

The technical controls, implemented by the system, act to either allow access to system PII data only to approved users or to make PII data unreadable outside of the system. These controls include encryption, authentication, firewalls, intrusion detection systems, and anti-malware systems.

The physical controls, implemented by the system, restrict access to CDC buildings and areas housing computers used by this system. These controls include guards, identification badges, key cards, locked doors, cipher locks, fences, alarms and closed circuit TV.

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	2/6/2024
<b>Privacy Analyst Comments:</b>	OpDiv Privacy Analyst: Joshua Mosios Status: Approved Date: February 6, 2024	<b>Privacy Analyst Days Open:</b>	

### SOP Review

<b>SOP Review Status:</b>	Approved	<b>SOP Signature:</b>	
<b>SOP Comments:</b>	Approved on behalf of Beverly Walker	<b>SOP Review Date:</b>	2/6/2024
		<b>SOP Days Open:</b>	4

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	2/8/2024
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Shanai Shobowale This PIA is ready for SAOP review and approval.	<b>Agency Privacy Analyst Days Open:</b>	2

### SAOP Review

<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	Signature.docx
<b>SAOP Comments:</b>	Approved on behalf of Bridget Guenther	<b>SAOP Review Date:</b>	3/1/2024
		<b>SAOP Days Open:</b>	22

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

## Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 10A	Data Feed Service, piafrmc dc	12/5/2023	Is this the correct number? Usually they are 8 digits. This is longer and looks more like an ICR number.	
PIA - 23	Data Feed Service, piafrmc dc	12/5/2023	I am unable to locate the referenced GRS. Where can I find this citation?	
PIA - 23	Data Feed Service, piafrmc dc	1/23/2024	Please include a citation.	
PIA - 1	BLAND, CRYSTAL	2/8/2024	PTA-7A: Reviewer notes that the response displays "Error" and the recalc didn't work.	
PIA - 1	Data Feed Service, piafrmc dc	9/30/2024	This System has been migrated within the OCIO ISB Infrastructure Services authorization boundary. All future updates should be made via the new Sub- Component application.	

## Admin Section

Is OpDiv Privacy Analyst Approved ?:	1	Is OpDiv Privacy Analyst Return ? :	0
Is Agency Privacy Analyst Approve ?:	1	Is SOP Return ?:	0
Is SAOP Approved?:	1	Is Agency Privacy Analyst Return ?:	0
Total Approved:	4	Is SAOP Return ?:	0
Total Approval Required:	4	Total Return:	0

## Miscellaneous Fields

Last Updated:	9/30/2024 4:01 PM	History Log:	<a href="#">View History Log</a>
---------------	-------------------	--------------	----------------------------------