

Copy PIA (Privacy Impact Assessment)

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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

PIA Name:	CDC - Cority - QTR3 - 2025 - CDC8746115	PIA ID:	3886084
Name of Component:	CDC - Cority	Name of ATO Boundary:	Cority
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	127
Submission Status:	Re-Submitted	Submit Date:	10/24/2025
Next Assessment Date:	N/A	Expiration Date:	1/1/2100
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC8746115
Legacy PIA ID:		Make PIA available to Public?:	Yes
1:	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
2:	Is this a FISMA-Reportable system?		Yes
3:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
4:	ATO Date or Planned ATO Date.		
5:	Is the system or electronic information collection, agency or contractor operated?		Agency

PTA

PTA

PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	The system/component Medgate has undergone rebranding by the company (Cority). Medgate has been rebranded as Cority. There are no other changes in the system.
PTA - 3:	Is the data contained in the system owned by the agency or contractor?	Agency

PTA - 4:

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.

Medgate, now known as Cority, is a data repository for Office of Safety, Security, and Asset Management/Occupational Health and Safety used by OSSAM/OHSO for use by OSSAM and Office of the Associate Director for Laboratory Science and Safety (OADLSS) to aid in accomplishing the following:

1) Increase reliability of data through daily systems back-ups, and enhanced diagnostic ability, 2) Provide greater confidentiality and security of records, 3) Increase efficiency of all staff members, 4) Provide readily available deployment records, 5) Improve compliance tracking, 6) Reduce record error and omissions, and 7) Provide effortless report generation.

Cority collects/ stores, employment status, phone and email, Date of Birth (DoB), User Identification (ID) and Medical Notes/Records and is used to view any key information needed to complete the clinical visit (i.e. eligibility, case history etc.)

This information collection is inherent for a clinical visit and is explained by nature during the clinical visit. Cority assists with the annually required Occupational Safety and Health Administration (OSHA) logs, immunization submissions to the Georgia Department of Public Health, data analysis and reporting, Employee Assistance Program (EAP), exposure monitoring/surveys by our industrial hygiene program, respiratory training and fit testing, incident tracking and investigations. Cority also collects injury illness data, EAP data, industrial hygiene, case management and ergonomic data.

Additional purpose is to collect status of vaccinated and un-vaccinated individuals, the additional information will include direct and/or indirect contractors.

PTA - 5:

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.

Cority collects/ stores information related to clinical data / medical notes, employment status, phone, mailing address and email address. DoB, User ID and Medical Notes/Records are used to view any key information needed to complete the clinical visit by CDC employees (i.e. eligibility, and case history). This information collection is inherent for a clinical visit and is explained about the nature during the clinical visit.

Cority assists with the annually required OSHA logs, immunization submissions to the Georgia Department of Public Health, data analysis and reporting, Employee Assistance Program (EAP), exposure monitoring/surveys by our industrial hygiene program, respiratory training and fit testing, incident tracking and investigations. Cority also collects injury illness data, EAP data, industrial hygiene, case management and ergonomic data.

Personal information is voluntary but is required for medical appointments and Work Phone. UserIDs are also used for authentication and audit records of user activity (information system security).

The primary purpose for collecting PII is to:

- a. To provide data necessary for proper medical evaluations and diagnoses, to ensure that proper treatment is administered, and to maintain continuity of medical care.
- b. To provide an accurate medical history of the total health care and medical treatment received by the individual as well as job and/or hazard exposure documentation and health monitoring in relation to health status and claims of the individual.
- c. To enable the planning for further care of the patient.
- d. To provide a record of communications among members of the health care team who contribute to the patient's care.

Access to the system is controlled by Active Directory (AD) which has a separate PIA. No user credentials are collected or stored.

Additional information based on a questionnaire, pertaining to respiratory system disease, and test results.

PTA - 5A:

Are user credentials used to access the system?

PTA - 5B:

Please identify the type of user credentials used to access the system.

HHS User Credentials
HHS/OpDiv PIV Card

PTA - 6:	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>The solution provides practitioners with the secure tools and insights needed to streamline, automate, and improve industrial hygiene, occupational health, ergonomics, and employee health operations, for a better performing workforce and lower costs.</p> <p>The purchase and use of a worker safety and health management system (Cority) by OSSAM for use by OSSAM and OADLSS aids in accomplishing the following: 1) increased reliability of data through daily systems back-ups, and enhanced diagnostic ability, 2) greater confidentiality and security of records, 3) increased efficiency of all staff members, 4) readily available deployment records, 5) improved compliance tracking, 6) reduced record error and omissions, and 7) effortless report generation.</p> <p>Cority collects/ stores, employment status, phone and email, DoB, User ID and Medical Notes/Records and is used to view any key information needed to complete the clinical visit (i.e. eligibility, case history etc.). This information collection is inherent for a clinical visit and is explained by nature during the clinical visit. Personal information is voluntary but is required for medical appointments and Work Phone. UserIDs are also used for authentication and audit records of user activity (information system security). User ID, Name and Work Phone are initially added to a user account, usually by request of their supervisor for system access and to perform a specific task. No other personal information is collected. The system is a data repository for occupational health, safety and disability management.</p> <p>Personal information is voluntary but is required for medical appointments. Patient Medical Information is voluntary and not required to schedule an appointment.</p> <p>Access to the system is controlled by Active Directory (AD) which has a separate PIA. No user credentials are collected or stored.</p>
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	Yes
PTA - 8:	Does the system include a website or online application?	Yes
PTA - 8A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	No
PTA - 9:	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.	CDC personnel and vendors are the only users to access the URLs. The purpose of the URL is for end users to access the information within the system
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 - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
PTA - 12:	Does the website use web measurement and customization technology?	No
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	
PTA - 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA - 13A:	Does the website collect PII from children under the age thirteen?	
PTA - 13B:	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?	
PTA - 14:	Does the system have a mobile application?	Yes
PTA - 14A:	Is the mobile application HHS developed and managed or a third-party application?	HHS
PTA - 15:	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	CDC personnel and vendors are the only users to access the application. The purpose of the mobile app is for end users to access the information within the system
PTA - 16:	Does the mobile application/ have a privacy notice?	Yes
PTA - 17:	Does the mobile application contain links to non-federal government websites external to HHS?	No
PTA - 17A:	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	No
PTA - 18:	Does the mobile application use measurement and customization technology?	No
PTA - 18A:	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	N/A
PTA - 19:	Does the mobile application have any information or pages directed at children under the age of thirteen?	No
PTA - 19A:	Does the mobile application collect PII from children under the age thirteen?	No
PTA - 19B:	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?	No
PTA - 20:	Is there a third-party website or application (TPWA) associated with the system?	No
PTA - 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

PIA

PIA

PIA - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	<p>Name</p> <p>Email Address</p> <p>Phone numbers</p> <p>Date of Birth</p> <p>Mailing Address</p> <p>Employment Status</p> <p>User Credentials</p> <p>Other - Free text Field - Medical Notes; Employee Assistance Program (EAP) Data, responses to health questionnaires, including information related to respiratory system conditions and associated test results.</p>
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Employees/ HHS Direct Contractors
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
PIA - 4:	For what primary purpose is the PII used?	<p>Cority collects/ stores, employment status, mailing address, phone and email, DoB, User ID and Medical Notes/Records, responses to health questionnaires, including information related to respiratory system conditions and associated test results and is used to view any key information needed to complete the clinical visit (i.e. eligibility, case history etc.)</p> <p>This information collection is inherent for a clinical visit and is explained by nature during the clinical visit. Personal information is voluntary but is required for medical appointments and Work Phone. UserIDs are also used for authentication and audit records of user activity (information system security). User ID, Name and Work Phone are initially added to a user account, usually by request of their supervisor for system access and to perform a specific task. No other personal information is collected. It is a data repository for occupational health, safety and disability management.</p> <p>Personal information is voluntary but is required for medical appointments. Patient Medical Information is voluntary and not required to schedule an appointment.</p> <p>Access to the system is controlled by Active Directory (AD) which has a separate PIA.</p>
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	N/A
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	This system does not collect SSN and/or Taxpayer ID.
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	N/A. This system does not collect SSN.

PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	Executive Orders 12107, 12196, and 12564; 5 U.S.C. chapters 11, 33, and 63.
PIA - 8:	Are records in the system retrieved by one or more PII data elements?	Yes
PIA - 8A:	Please specify which PII data elements are used to retrieve records.	User ID credentials only are used to retrieve records.
PIA - 8B:	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.	OPM/GOVT-10 Employee Medical File System Records. 09-40-0002 Public Health Service (PHS) Commissioned Corps Medical Records
PIA - 9:	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains In-person Online Government Sources Within the OPDIV
PIA - 10:	Is there an Office of Management and Budget (OMB) information collection approval number?	No
PIA - 10A:	Provide the information collection approval number.	
PIA - 10B:	Identify the OMB information collection approval number expiration date.	
PIA - 10C:	Explain why an OMB information collection approval number is not required.	This information system does not collect information from the general public.
PIA - 11:	Is the PII shared with other organizations outside the system's Operating Division?	Yes
PIA - 11A:	Identify with whom the PII is shared or disclosed.	State or Local Agency/Agencies Within HHS
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	May provide GENERAL data (numbers of vaccinated individuals) to entities such as HHS, United States Government (USG), or state of Georgia (GA), however, not provide specific records. Immunization Records are sent to GA Dept. of Public Health (GRITS)

PIA - 11C:	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)).	There are no agreements in place. By mandate, CDC imports immunization data from this system into the Georgia Dept. of Public Health system GRITS (Georgia Registry of Immunization Transactions and Services). The Georgia Immunization Registry is designed to collect and maintain accurate, complete and current vaccination records to promote effective and cost-efficient disease prevention and control. The Georgia Immunization Registry law, passed in 1996 and expanded by House Bill 1526, requires reporting by "any person who administers a vaccine or vaccines licensed for use by the United States Food and Drug Administration to a person."
PIA - 11D:	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.	Any data that is exported from the system is documented in the audit logs.
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 12A:	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
PIA - 13:	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.	Personal information is required to schedule appointments at clinics, complete hearing assessments, pulmonary function testing, and for medical enrollment and recalls. If the patient does not want to provide their information, they will not be scheduled for medical appointments.
PIA - 14:	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.	Privacy Notices are posted at the clinic. If the purpose for collecting the PII changes, it would be explained in the updated Notice as posted, and the patient would be provided the opportunity to accept or decline consent.
PIA - 15:	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.	Patients can direct their concerns to the clinic management in person or via email (ClinicFeedback@cdc.gov).
PIA - 16:	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.	The Occupational Health Nurse reviews the records and history daily to ensure information integrity is maintained. Also, the system has built-in reports and dashboards to review, which is used by the system administrator/management to review data annually.
PIA - 17:	Identify who will have access to the PII in the system.	Users Administrators Developers Contractors
PIA - 17A:	Select the type of contractor.	HHS/OpDiv Direct Contractors

PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	<p>Users - Users only have access to their own personal data.</p> <p>Administrators - To ensure the integrity of the employee's Demographic record is maintained and updated accordingly with the CDC Neighborhood.</p> <p>Developers - The CDC in-house developers have access to the PII to ensure overall functionality, but the application developers don't have access to PII.</p> <p>Contractors - The Clinic has direct contractor nurses who have access to PII and some medical surge staff (indirect contractors) during public health emergencies.</p>
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	All users must be approved by the Business Steward based on their role, duties and responsibilities prior to gaining access to the data. Role Based Access Control (RBAC) is utilized. The roles are predefined, and the users are assigned those roles as appropriate.
PIA - 20:	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 system depends on CDC Active Directory for access control. User level of application rights and access levels are controlled with Role Based Access Control, based on a need to know for job duties.
PIA - 21:	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 users are required to take Information Security and Privacy Awareness Training (SAT) on an annual basis, and HHS Role Based Training (RBT) every 3 years.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	Not applicable

PIA - 23:

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 Records Control Schedule. Source documents for computer are disposed of when no longer needed by program officials. 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 treatment. GRS GRS 5.2 | Destroy upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later.

Input Data: Data entered by user via web form | GRS GRS 5.2. item 020. | Contains patient visits, and charts (Notify before deletion)

Output Data: Routine reporting material Dispose when no longer needed | GRS 5.2. item 020

System Data: Created to handle business processes that require control of information (tracking, finding aids, indexes, etc).

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.

Administrative Controls: In accordance with the Federal Information Security Modernization Act of 2014 (FISMA) and the HHS Information Systems Security and Privacy Policy, CDC, Office of Safety, Security, and Asset Management (OSSAM) requires annual information security and privacy awareness for all agency personnel and contractors who access information systems that support the operation and assets of the agency. Additionally, Role Based Access Control is used to ensure that only those employees with a need to know for their job duties have access to the data.

Technical Controls: Cority uses smart cards, passwords and firewalls to manage access to resources and systems and provide protection for those resources, systems and data. Access to computerized records is limited, through use of user IDs and password entry.

Physical controls: include security guards, identification badges, key cards, and closed-circuit TV. Paper records are stored in locked cabinets or in secured rooms with access limited to those personnel whose official duties require access.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	10/24/2025
Privacy Analyst Comments:		Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	<p>10/10: Please review and address my comments and recommendations. Contact me with any questions. Please review, revise and resubmit ASAP. - BEW</p> <p>10/22: Please revisit and address comments @ PIA Qs 1, 4, 5I 11D &14. Also see my email with comments re PTA concerns. Please revisit and resubmit ASAP. Reach out with any questions. - BEW</p> <p>10/24: You didn't fully address my concern re PIA-14. Please see my new note there, revise your response to include the requested info and return ASAP. -- BEW</p> <p>10/24: /s/ Beverly E Walker, SOP</p>	SOP Review Date:	10/24/2025
		SOP Days Open:	0

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	11/24/2025
Agency Privacy Analyst Comments:	<p>Reviewer: Shanai Shobowale</p> <p>11/24/2025 This PIA is ready for SAOP review and approval.</p>	Agency Privacy Analyst Days Open:	31

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	SAOP Signature.docx
SAOP Comments:		SAOP Review Date:	11/28/2025
		SAOP Days Open:	4

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 6	Data Feed Service, piafrmc dc	10/1/2025	Please correct "no" to "not".	
PIA - 6A	Data Feed Service, piafrmc dc	10/1/2025	Please correct "no" to "not".	
PIA - 11B	Data Feed Service, piafrmc dc	10/1/2025	Please spell out, "USG", "GA", first use.	
PIA - 22	Data Feed Service, piafrmc dc	10/1/2025	Please explain or define what type of training this is "FGOV_01_A26_LC_ENUS, 2.2".	
PIA - 24	Data Feed Service, piafrmc dc	10/1/2025	PlESE spell out "OSSAM", first use.	
PIA - 4	Data Feed Service, piafrmc dc	10/10/2025	<p>First, there should only be ONE primary purpose; you have listed 4. Of these 4, which is THE key objective for the system? Answer that and the remaining portions of your response should be listed as secondary purposes in response to Q5.</p> <p>You should also edit your response to include when, where and why the PII is shared/disclosed?</p>	
PIA - 5	Data Feed Service, piafrmc dc	10/10/2025	See my comment at Q4 and revise accordingly.	
PIA - 8B	Data Feed Service, piafrmc dc	10/10/2025	<p>Re "New HHS SORN In Progress (09-90-2102 Health Records about HHS Employees, Contractors, and Visitors Not Covered by Other Notice) "... Delete this reference since it has been in draft stage within the Department since July 2020 or 2021 and is therefore not authoritative. It most recently came up again for review and discussion in late August 2025; however, nothing further. Moreover, there are applicable SORNs in place; "In Progress" should be used when a SORN is required but not yet finalized and no other SORN applies.</p>	
PIA - 10C	Data Feed Service, piafrmc dc	10/10/2025	Delete "N/A" so that the response simply reads: This information system does not collect information from the general public.	

PIA - 11C	Data Feed Service, piafrmdc 10/10/2025	<p>You referenced MedGate here and reviewers of this document may read this as an entirely different system. To avoid confusion, suggest that you either refer to it throughout as Cority or simply state "the system".</p>
PIA - 11D	Data Feed Service, piafrmdc 10/10/2025	<p>Nonresponsive. Because these records are subject to the Privacy Act, CDC must maintain an accounting of disclosures.</p> <p>Every time CDC discloses a Privacy Act record externally for a reason other than the FOIA, CDC is required to document:</p> <ul style="list-style-type: none"> • The date, nature, and purpose of each disclosure; and • The name and address of the recipient. <p>Also, the accounting must be maintained for five years after the disclosure occurred or the life of the record (whichever is longer).</p> <p>An audit log documents user actions and does not accomplish this. If you do not currently have these procedures in place, explain why not and what steps you will take to resolve. and when.</p> <p>If the individual named in the record requests an accounting of disclosures, HHS must provide the details of all disclosures except for certain ones which relate to civil or criminal law enforcement</p>
PIA - 8A	Data Feed Service, piafrmdc 10/10/2025	<p>User credentials? Are you saying that you use the user ID of the subject to retrieve their records? And if so, can you also use the subject's name? Your response needs clarity</p>
PIA - 14	Data Feed Service, piafrmdc 10/10/2025	<p>This question isn't about the posting of privacy notices but rather it evaluates what will occur if information is used for purposes that are different from those specified prior to or during collection. Your response should address the following:</p> <ul style="list-style-type: none"> • When and how notice will occur or why notice will not occur; and • When and how individuals will have an opportunity to consent to the material

different purpose or why individuals will not have an opportunity to consent.

PIA - 16	Data Feed Service, piafrmcdc 10/10/2025	How is the data reviewed for availability, accuracy and relevancy ? By whom?
PIA - 11D	Data Feed Service, piafrmcdc 10/14/2025	Non-Disclosure agreement for Occupational Health Clinic Access to Cority System.
PIA - 1	Data Feed Service, piafrmcdc 10/16/2025	<p>User credentials should be excluded based on the review of the PTA, as it was not part of the PII collected. However, employment status and medical records (classified as PHI) should be checked here, since they were included in Sections 5 and 6 of the PTA.</p> <p>Additionally, mailing address should be added to Sections 5 and 6 of the PTA. In PTA 6, add the explanation e.g. inclusion of mailing address is necessary to support communication and delivery of physical correspondence related to services, benefits, or regulatory notices, where applicable.</p>
PIA - 14	Data Feed Service, piafrmcdc 10/16/2025	Updated the section after consulting with the submitter.
PIA - 11D	Data Feed Service, piafrmcdc 10/16/2025	<p>Please review Beverly's comment above. The provided non-disclosure agreement (NDA) does not exempt the system from FOIA obligations. If the occupational health or Employee Assistance Program (EAP) system is managed by a federal agency such as OSHA, NIOSH, or another federal health entity then records maintained within that system may be subject to FOIA requests.</p> <p>If any portion of a record falls under one of FOIA's nine exemptions (e.g., personal privacy, medical confidentiality, law enforcement), that part of the record can be redacted and the remaining non-exempt information can be disclosed. The NDA serves to hold employees accountable for appropriate use of information but does not override FOIA requirements.</p> <p>Please verify whether any FOIA exemptions apply to the data in question. If an exemption is applicable, update your response to</p>

reflect the specific exemption and the FOIA office is required to redact only the protected portions. If no exemption applies, include the appropriate method for disclosure in accordance with FOIA.

PIA - 11D	Data Feed Service, piafrmc dc 10/16/2025	Additional artifact regarding FOIA requests on EMR systems.
PIA - 1	Data Feed Service, piafrmc dc 10/22/2025	Uncheck Medical Records Numbers as it does not apply. Employees' health related files/records maintained by the clinic as part of Occupational Health Services/clinic are not considered medical records. Medical records (and therefore medical records numbers) are maintained by an individual's healthcare provider.
PIA - 4	Data Feed Service, piafrmc dc 10/22/2025	<p>Nonresponsive as you have presented information that promotes the system, while the question is asking you to describe all the ways that PII is used in the system as well as when, where, and why that PII is disclosed and/or shared. Looking back at your last submission (MEDGATE), you wrote the following describing the data and how it is used:</p> <p>*****</p> <p>Medgate collects/ stores, employment status, phone and email, DoB, User ID and Medical Notes/Records and is used to view any key information needed to complete the clinical visit (i.e. eligibility, case history etc.) This information collection is inherent for a clinical visit and is explained by nature during the clinical visit. Personal information is voluntary but is required for medical appointments and Work Phone. UserIDs are also used for authentication and audit records of user activity (information system security). User ID, Name and Work Phone are initially added to a user account, usually by request of their supervisor for system access and to perform a specific task. No other personal information is collected. It is a data repository for occupational health, safety and disability management.</p> <p>Personal information is voluntary but</p>

is required for medical appointments. Patient Medical Information is voluntary and not required to schedule an appointment.

UserIDs are also used for authentication and audit records of user activity (information system security). User ID, Name and Work Phone are initially added to a user account, usually by request of their supervisor for system access and to perform a specific task. No other personal information is collected. It is a data repository for occupational health, safety and disability management.

More than likely, the name change did not influence a change to the data characterization, so you should probably use that PIA as a basis for answering the questions here.

Reach out with questions.

PIA - 5	Data Feed Service, piafrmcdc 10/22/2025	If you adopt my suggestion to the previous question, this response could be N/A as there would be no secondary. You may reach out to us for further assistance.
PIA - 11D	Data Feed Service, piafrmcdc 10/22/2025	Nonresponsive. As previously noted, this is a Privacy Act system and if individuals who have records in it request their own records, you must maintain an accounting of these requests as I previously explained. You answered this question @Q24c in the old Medgate PIA and it was accepted. If you need a copy for reference, reach out.
PIA - 14	Data Feed Service, piafrmcdc 10/22/2025	Reference your response @Q28 of the previous MedGate PIA: " Privacy Notices are posted at the clinic and the privacy notice displays when collecting PII data online. If the purpose of PII changes, patients are notified and asked to provide consent." Using this as a basis. revise to also indicate how they are notified (electronically during online data collection? By email? Verbally at the clinic? In writing at the clinic? etc. Keep in mind that you MUST advise

individuals when you are collecting their personal data how it will be maintained, used, and for how long ... this is an obligation. Your response as written implies that whether or not the notification is given is a choice; it isn't.

PIA - 14

Data Feed Service, piafrmcdc 10/24/2025

While you modified this response to reflect the prior submission, you didn't completely address my concern as raised. As was noted previously, you should also indicate how they are notified (e.g., electronically during online data collection? By email? Verbally at the clinic? In writing at the clinic? etc.). Please revise your current response to include the method as previously as was previously requested.

Admin Section

Is OpDiv Privacy Analyst Approved ?: 1

Is OpDiv Privacy Analyst Return ? : 0

Is SOP Return ?: 0

Is Agency Privacy Analyst Approve ?: 1

Is Agency Privacy Analyst Return ?: 0

Is SAOP Approved?: 1

Is SAOP Return ?: 0

Total Approved: 4

Total Return: 0

Total Approval Required: 4

Miscellaneous Fields

Last Updated: 11/28/2025 7:00 PM

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