

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

PIA Name:	CDC - CDCDN - QTR2 - 2025 - CDC8686194	PIA ID:	3264351
Name of Component:	CDC - CDC Digital Notifications	Name of ATO Boundary:	CDC Digital Notifications
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	70
Submission Status:	Re-Submitted	Submit Date:	6/11/2025
Next Assessment Date:	N/A	Expiration Date:	6/24/2028
Office:		OPDIV:	CDC
Security Categorization:	Low	OpDiv PIA ID:	CDC8686194
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?		Contractor

PTA

PTA

PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	N/A
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.

CDC Digital Notifications (CDCDN) offers the general public the ability to subscribe for updates to CDC.gov via email or text reminders. The reminders tell people of changes to the CDC web site, or highlight and promote special health messages/campaigns at various times. The information being shared in the health messages/campaigns is the same information that is on the public web site, but CDCDN offers this service as a convenience for users to be notified of changes or key messages published to CDC.gov.

CDCDN uses the Adobe Campaign service which allows the CDC to configure, manage, and customize email marketing campaigns. CDCDN also enables reporting to gauge the effectiveness of marketing campaigns. The CDC controls the application configuration settings. Adobe Campaign will collect mobile phone numbers and email addresses, on behalf of CDCDN, from the public in order to provide public health messages and CDC campaigns to the public. The Email address and mobile phone numbers of the data subjects/subscribers are maintained within an Adobe database.

With the advances in technology and service delivery systems in other sectors, the public's expectations of the Government have continued to rise. The Federal Government is tasked with keeping pace with and even exceeding those expectations. Government must also address the need to improve its services. Private sector best practices include increasingly popular lower-cost, self-service options accessed by the Internet or mobile phone and improved processes that deliver services faster and more responsively, reducing the overall need for customer inquiries and complaints. CDCDN helps the CDC streamline and make more efficient its service delivery to better serve the public.

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.

CDCDN offers the general public the ability to subscribe for updates to CDC.gov via email or text reminders. The reminders tell people of changes to the CDC web site, or highlight and promote special health messages/campaigns at various times. The information being shared in the health messages/campaigns is the same information that is on the public web site, but CDCDN offers this service as a convenience for users to be notified of changes or key messages published to CDC.gov. CDCDN helps the CDC streamline and make more efficient its service delivery to better serve the public.

The information collected, maintained, and stored by Adobe Campaign includes email address and mobile phone numbers of public users who choose to subscribe to the service. Submission of email address and mobile phone numbers is voluntary. This information is collected and maintained, temporarily; for as long as a public user remains subscribed to the service. The information is used for the system to be able to disseminate CDC topics on disease and public health related information via email and text messaging service. It also helps CDCDN to streamline and make more efficient its service delivery to better serve the public.

User credentials for CDCDN employees and direct contractors are also stored in the Adobe Campaign databases. CDC users log in to CDCDN via the CDC's Secure Access Management Services (SAMS) portal. The CDC email address of CDC users who log into CDCDN is stored on the Adobe Analytics network to be able to assign user roles to the system.

CDCDN uses Active Directory (AD), Secure Access Management Services (SAMS), Personal Identity Verification (PIV), User ID and Password

PTA - 5A:

Are user credentials used to access the system?

PTA - 5B:

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

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.	Opt-in and opt-out is a built-in product functionality for Adobe Campaign. End users can globally opt-out of an email/text message campaign. CDCDN will set-up and configure the opt-out page (Adobe Campaign provides an API to set-up the preference pages). CDCDN will send an unsubscribe link in every emails/text message sent for a CDC campaign message. The information collected, maintained, and stored by Adobe Campaign includes email address and mobile phone numbers of public users who choose to subscribe to the service. Submission of email address and mobile phone numbers is voluntary. This information is collected and maintained, temporarily; for as long as a public user remains subscribed to the service. The information is used for the system to be able to disseminate CDC topics on disease and public health related information via email and text messaging service. It also helps CDCDN to streamline and make more efficient its service delivery to better serve the public. CDCDN uses Active Directory (AD), Secure Access Management Services (SAMS), Personal Identity Verification (PIV), User ID and Password are used for log-in.
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	No
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)?	Yes
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.	https://cdc.campaign.adobe.com
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?	Yes
PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	No
PTA - 12:	Does the website use web measurement and customization technology?	Yes
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	Session Cookies - Does Not 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?	No
PTA - 14A:	Is the mobile application HHS developed and managed or a third-party application?	
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.	

PTA - 16:	Does the mobile application/ have a privacy notice?	
PTA - 17:	Does the mobile application contain links to non-federal government websites external to HHS?	
PTA - 17A:	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
PTA - 18:	Does the mobile application use measurement and customization technology?	
PTA - 18A:	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
PTA - 19:	Does the mobile application have any information or pages directed at children under the age of thirteen?	
PTA - 19A:	Does the mobile application collect PII from children under the age thirteen?	
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?	
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.	Email Address Phone numbers User Credentials
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Business Partners/Contacts (Federal, state, local agencies) Employees/ HHS Direct Contractors Members of the public
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?	Centers for Disease Control (CDC) offers the general public the ability to subscribe for updates to CDC.gov via email or text message reminders. The reminders tell people of changes to the CDC web site or highlight and promote special health messages/campaigns at various times.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	CDC user credentials collected from CDC employees and direct contractors, who log in and administer the site.
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	The Paperwork Reduction Act and Executive Order (EO) 13571
PIA - 8:	Are records in the system retrieved by one or more PII data elements?	No
PIA - 8A:	Please specify which PII data elements 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.	
PIA - 9:	Identify the sources of PII in the system.	<p>Directly from an individual about whom the information pertains</p> <p>Online</p> <p>Government Sources</p> <p>Within the OPDIV</p> <p>Non-Government Sources</p> <p>Members of the Public</p>
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.	CDCDN's (CDC Digital Notification) use falls under interactive communications which is exempt.
PIA - 11:	Is the PII shared with other organizations outside the system's Operating Division?	No
PIA - 11A:	Identify with whom the PII is shared or disclosed.	
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	
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)).	
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.	
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.	Opt-in and opt-out is a built-in product functionality for Adobe Campaign. End users can globally opt-out of an email/text message campaign. CDCDN will setup and configure the opt-out page (Adobe Campaign provides an API "Application Programming Interface" to set-up the preference pages). CDCDN will send an unsubscribe link in every emails/text message sent for a CDC campaign message.
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.	When major changes occur, users are notified via their subscription service. They then have the option to unsubscribe at any time.
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.	Subscribers can contact Institute of Microbial Technology (IMTech@cdc.gov help desk) to resolve individual concerns about their PII. All subscribers will be contacted with 5 business days, via email, by the Office of the Associate Director of Communications (OADC) to address their concerns.

<p>PIA - 16:</p>	<p>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.</p>	<p>Since this is a subscription service that users register for, there is no formal process for periodic reviews of PII. At the time of registration, new users are sent a verification/validation link via email and/or text message; this verifies the integrity of the information. Users are also sent an unsubscribe link whenever CDCDN sends an email and/or text message from the service; this validates the accuracy and availability of the PII information.</p> <p>Adobe Campaign product teams also schedule change releases on a controlled basis, that includes PII review. These releases are intended for new functionality, bug fixes and other significant product updates.</p>
<p>PIA - 17:</p>	<p>Identify who will have access to the PII in the system.</p>	<p>Administrators Contractors</p>
<p>PIA - 17A:</p>	<p>Select the type of contractor.</p>	<p>HHS/OpDiv Direct Contractors</p>
<p>PIA - 17B:</p>	<p>Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?</p>	<p>Yes</p>
<p>PIA - 18:</p>	<p>Provide the reason why each of the groups identified in PIA - 17 needs access to PII.</p>	<p>All requests from Adobe Admins must include a business justification before being routed to the group owner's queue for approval. If the request is approved by a Manager, SailPoint will add the user's record to the appropriate LDAP (Lightweight Directory Access Protocol) group in the Experience Cloud LDAP repository.</p> <p>CDCDN Admins are determined by the CDC Operational Divisions Branch Chief. Once the request is approved the Office of the Associate Director for Communications system Admins will assign the user his/her correct access in the system.</p> <p>Contractors will serve as Administrators.</p>
<p>PIA - 19:</p>	<p>Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>All requests from Adobe Admins must include a business justification before being routed to the group owner's queue for approval. If the request is approved by a Manager, SailPoint will add the user's record to the appropriate LDAP group in the Experience Cloud LDAP repository.</p> <p>CDCDN Admins are determined by the CDC Operational Divisions Branch Chief. Once the request is approved the Office of the Associate Director for Communications (OADC) system Admins will assign the user his/her correct access in the system.</p>

<p>PIA - 20:</p>	<p>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.</p>	<p>Access to the Adobe Campaign production environments is provisioned only on a need-to-know basis with appropriate business justification as collected from CDC employees and direct contractors, who log in and administer the site. Access to the production environment is controlled via Active Directory group membership. Each Active Directory group is created with consideration to least privilege.</p> <p>CDCDN uses Active Directory (AD), Secure Access Management Services (SAMS), User Credentials (Personal Identity Verification (PIV), User ID and Password)</p> <p>CDCDN Admins only have access to the PII for individuals who subscribe to their Operational Divisions subject areas.</p>
<p>PIA - 21:</p>	<p>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.</p>	<p>Adobe requires employees to complete a general security awareness training on an annual basis. Training content is aligned with Adobe security policies and standards, reviewed and updated annually and refreshed periodically. Employees are given 30 days to complete the training once it is delivered.</p> <p>Additionally, CDCDN users take the Annual Security Awareness training.</p>
<p>PIA - 22:</p>	<p>Describe the training system users receive (above and beyond general security and privacy awareness training).</p>	<p>In addition to the Adobe general security and awareness training, system users complete additional training on Adobe Captivate Prime, Adobe's learning management system. System users are required to complete a Privacy Essentials course which provides deeper context around data, privacy, personal information and designing with privacy in mind. Additionally, Adobe has designed and implemented a security belt training program for engineers and site reliability engineers to complete. The security belt trainings are crafted for the Adobe engineering community and based on four progressive advancements, in the following order: white, green, brown and black. These trainings are intended to create security awareness and ensure security expertise in deploying products or services. These courses also help Adobe personnel to understand and meet applicable compliance and regulatory requirements.</p>
<p>PIA - 23:</p>	<p>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).</p>	<p>CDCDN reviews, archives, or destroys material in accordance with the OADC Records Management Policy (Electronic Database records are maintained for a period of 2 years): CDC-01-1-08</p>

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

All requests from Adobe Admins must include a business justification before being routed to the group owner's queue for approval. If the request is approved by a Manager, SailPoint will add the user's record to the appropriate LDAP group in the Experience Cloud LDAP repository. Adobe requires employees to complete a general security awareness training on an annual basis. In addition to the Adobe general security and awareness training, system users complete additional training on Adobe Captivate Prime, Adobe's learning management system. System users are required to complete a Privacy Essentials course which provides deeper context around data, privacy, personal information and designing with privacy in mind.

Technical

Normal logical access controls apply to CDCDN. This would include (but isn't limited to) access provisioning and periodic review, strong multi-factor authentication, logging and monitoring (security operations center team monitors all system logs 24/7) of admin activity and actions. There is also database encryption at rest and for data in transit.

Physical

Physical controls are covered by the Amazon Web Services (AWS) infrastructure.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	6/11/2025
Privacy Analyst Comments:		Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	Approved on behalf of Beverly Walker	SOP Review Date:	6/23/2025
		SOP Days Open:	12

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	6/25/2025
Agency Privacy Analyst Review Comments:	<p>Reviewer: Nestor Villafuerte</p> <p>6/25/2024 The comments have been addressed this PIA is ready for SAOP review and approval:</p> <p>Does system have ATO? Yes</p> <p>ATO Date: 6/27/2025</p> <p>ATO Expiration Date: 6/26/2025</p> <p>PTA-5A and PTA-5B was addressed in PTA-5: CDCDN uses Active Directory (AD), Secure Access Management Services (SAMS), Personal Identity Verification (PIV), User ID and Password. Responses may not have been able to sync to PTA-5A and PTA-5B.</p>	Agency Privacy Analyst Days Open:	2

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature Page.docx
SAOP Comments:	Approved on behalf of the SAOP	SAOP Review Date:	6/25/2025
		SAOP Days Open:	0

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
6-25-2025 EMAIL_Re_CDC - CDCDN - QTR1 - 2025 - CDC8670082.pdf	239840	.pdf	6/25/2025 9:54 AM	0

Comments				
Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmcdc	6/3/2025	According to the PTA "PIV, User ID and Password" are used. Please add these to the response.	
PIA - 9	Data Feed Service, piafrmcdc	6/3/2025	According to the previously approved PIA, "online" was selected. Please confirm this response or add it as a source of PII. If "online" is no longer used, please explained why it changed and who authorized the change.	
PIA - 10C	Data Feed Service, piafrmcdc	6/3/2025	First use, please spell out the acronym for "CDCDN"	
PIA - 13	Data Feed Service, piafrmcdc	6/3/2025	First use, please spell out the acronym for "API".	
PIA - 15	Data Feed Service, piafrmcdc	6/3/2025	Please spell out the acronym for IMTech or define what IMTech is for this response. ex-help desk, tech support.	
PIA - 18	Data Feed Service, piafrmcdc	6/3/2025	Please verify this response, as it does not address the question to provide the reason why Administrators need access to PII. Please refer to the previously approved PIA #31. First use, please spell out the acronym for "LDAP".	
PIA - 20	Data Feed Service, piafrmcdc	6/3/2025	According to the PTA, "Secure Access Management Services (SAMS)" is also in place. Please confirm or update this response with this technical method	
PIA - 10C	Data Feed Service, piafrmcdc	6/13/2025	After speaking with ICRO, OMB approval is not required.	
PIA - 1	VILLAFUERTE, NESTOR	6/24/2025	Does the system have an ATO date? For PTA-5A and 5B please provide a response; PTA-5 states that the system uses AD.	

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:	6/25/2025 12:01 PM	History Log:	View History Log
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