

## 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 - eIPP - QTR2 - 2023 - CDC6736134	<b>PIA ID:</b>	1679909
<b>Name of Component:</b>	CDC - electronic Import Permit Program	<b>Name of ATO Boundary:</b>	electronic Import Permit Program
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	525
<b>Submission Status:</b>	Re-Submitted	<b>Submit Date:</b>	9/20/2024
<b>Next Assessment Date:</b>	10/01/2027	<b>Expiration Date:</b>	10/1/2027
<b>Office:</b>		<b>OPDIV:</b>	CDC
<b>Security Categorization:</b>	Low	<b>OpDiv PIA ID:</b>	CDC6736134
<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.		
<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 IPP at CDC regulates the importation of infectious biological agents, infectious substances, and vectors of human disease into the United States. The program may also inspect applicants to ensure that the facilities have implemented the appropriate biosafety measures for the infectious biological agent, infectious substance, or vector to be imported.</p> <p>The Centers for Disease Control and Prevention's Import Permit Program (IPP) regulates the importation of infectious biological agents, infectious substances, and vectors of human disease into the United States. Prior to issuing an import permit, IPP reviews all applications to ensure that entities have appropriate safety measures in place for working safely with these imported materials. IPP may inspect applicants to ensure that the facilities have implemented the appropriate biosafety measures for the infectious biological agent, infectious substance, or vector to be imported. This system, the electronic Import Permit Program (eIPP), will be used to allow applicants to request a permit, obtain approval/denial, and track the permit for verification of completion.</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>eIPP will collect information that includes sender and recipient individuals' names; organization name and address; business phone, fax, and email; shipment information; description of biological agent(s); and biosafety measures to be used.</p> <p>Data is maintained in the system for a 7-10 year time period and then will be archived from the system.</p>
<b>PTA - 5A:</b>	Are user credentials used to access the system?	Yes, but the user credentials are maintained in a separate system (e.g., AD, AMS) and not collected or maintained by this system. The system providing credentials is
<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>All data fields collected are required in order for the IPP Staff to properly assess the risk associated to the agents being sent. In order to ensure safety of the public knowing what biological agent, where agents are coming from , where they are going, who and how they are being shipped, handled and maintained must be known in order to properly identify any risks or potential dangers in order to approve a permit request. There may also be instances where the shipment information may be used by Customs and Border Patrol.</p> <p>eIPP will track who is requesting the import, where they are importing material, how they will transfer and handle materials, and when the import will occur. Data to be collected will include the sender and recipient individuals' names; organization name and address; business phone, fax, and email; shipment information; description of biological agent(s); and biosafety measures to be used. Data is maintained in the system for a 7-10 year time period and then will be archived from the system.</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?	No
<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.	The Centers for Disease Control and Prevention's Import Permit Program (IPP) regulates the importation of infectious biological agents, infectious substances, and vectors of human disease into the United States. Prior to issuing an import permit, IPP reviews all applications to ensure that entities have appropriate safety measures in place for working safely with these imported materials. IPP may inspect applicants to ensure that the facilities have implemented the appropriate biosafety measures for the infectious biological agent, infectious substance, or vector to be imported. This system, the electronic Import Permit Program (eIPP), will be used to allow applicants to request a permit, obtain approval/denial, and track the permit for verification of completion.
<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?	Yes
<b>PTA - 12A:</b>	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
<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**

<b>PIA</b>		
<b>PIA - 1:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address Phone numbers Mailing Address
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Business Partners/Contacts (Federal, state, local agencies) Members of the public
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	501 - 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	The primary purpose for the use of the PII is to contact applicants regarding their permit applications.
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	N/A
<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.	Public Health Security and Bioterrorism Preparedness and Response Act of 2002 and The Agricultural Bioterrorism Protection Act of 2002 (Pub. L. 107-188).
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	Yes
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	Name and business email address
<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.	09-20-0170 - National Select Agent Registry (NSAR)/Select Agent Transfer and Entity Registration Information System (SATERIS), HHS/CDC/COTPER

<b>PIA - 9:</b>	Identify the sources of PII in the system.	<p>Directly from an individual about whom the information pertains</p> <ul style="list-style-type: none"> <li>Phone</li> <li>Email</li> <li>Online</li> </ul> <p>Government Sources</p> <ul style="list-style-type: none"> <li>State/Local/Tribal</li> <li>Foreign</li> <li>Other Federal Entities</li> </ul> <p>Non-Government Sources</p> <ul style="list-style-type: none"> <li>Members of the Public</li> <li>Private Sector</li> </ul>
<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 NO. 0920-0199 (Current approval is expired. Center is awaiting final approval and approval date.
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	8/31/2024
<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 are able to opt out of not entering data into the fields, however after submission they may have to follow up with the Import Permit program by other mechanisms by calling 1-833-271-8310 or by mail to Import Permit Program MS H21-7, 1600 Clifton Road, Atlanta, GA 30329-4027, in order to complete the processing of their request for importing of an agent.
<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.	The Import Permit program sends out email web grams to all Import Permit current users when any changes are made to the system or any program practices. The IPP website will also have a notification area to provide users of updates or changes.

<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.	The process to be followed in the event an individual feels their information is compromised is to notify the system owner in writing by submitting an email to eIPPSupport@cdc.gov or by calling the provided toll-free support line provided and listed on all websites and former notices. The case will be logged into our tracking system and reported to the Security Steward who will follow the Breach Notification and Incident Response Plan to conduct a review and assessment regarding the suspected incident in conjunction with the CDC Cybersecurity Incident Response Team (CSIRT) and CDC Privacy Office.
<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.	At this time the system allows the Individual to verify their information during each login. In addition, the Import Permit program reviews records when renewing or amending applications on an annual basis. The security steward is also responsible for performing routine checks on system data throughout the year.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	<p>Users</p> <p>Administrators</p> <p>Developers</p> <p>Contractors</p>
<b>PIA - 17A:</b>	Select the type of contractor.	HHS/OpDiv Direct Contractors
<b>PIA - 17B:</b>	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
<b>PIA - 18:</b>	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	<p>Users - In order to process Import Permit requests</p> <p>Administrators - In order to maintain systems and databases</p> <p>Contractors/developers (badged) - In order to help troubleshoot system or database issues that cannot be resolved locally.</p>

<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	<p>There is an established Standard Operating Procedure (SOP) in place that provides instructions for all users to complete. This SOP requires an access request form to be completed and approved along with a completed Rules Of Behavior (ROB). The form and ROB must then go through a review, validation and approval process prior to a user ever obtaining access.</p> <p>A user completes the Access request form request access to IPP, role(s) being requested, and their justification as to why they believe access is needed.</p> <p>The form is then provided to a Full-Time Equivalent (FTE) within the IPP program who can validate the need and justification for access to the role(s) selected.</p> <p>Validated forms are then provided to the System Security steward who will review the form to ensure it is completed correctly. Once reviewed for completeness, the security steward contacts the Office of Safety, Security, and Asset Management (OSSAM) to ensure the proper clearance levels based on roles the user has been approved for. If the form is complete and all required clearances are in place, a request is submitted to the System team to have the account and access granted. If not, the forms are returned to the requester and the FTE validator noting the reason(s) why access can not be granted.</p>
<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 established SOP defines roles and they are assigned based on approval and justification of access. The least privilege model is used to determine who may access the system and PII. The system is designed to have role based restrictions to include System Administrator, Branch Chief, Technical Reviewer, and Permittee. Each role has restrictions.
<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 users receive standardized Privacy Training at least annually as a requirement.
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	There is periodic and recurring training of staff regarding sharing information.
<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).	Data will be maintained in accordance with the National Archives and Records Administration (NARA) complainant file retention and destructive plans. The Division of Select Agents and Toxins Records retention schedule DAA-0442-2019-0001-0003. The PII will be retained for 10 years.

**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 -- IPP stores data in password protected databases hosted in Azure Fed Ramp Commercial Cloud. Additional Administrative controls are in place to protect PII with Rules of Behavior, training, notifications, and disclosures.

Technical -- Technical Controls are in place with the Cybersecurity Program Office (CSPO) and Digital Services Office (DSO), Logical access barriers include Access Control Lists, Active Directory Federation Services (ADFS) Accounts/groups, and Intrusion detection.

Physical -- Physical controls for CDC are in place through the Office of Safety, Security, and Asset Management (OSSAM) including guards, smart-card, and Closed-Circuit TV. Microsoft Azure facilities server locations also maintain Guards, Access card controls, and Closed-Circuit TV.

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	9/20/2024
<b>Privacy Analyst Comments:</b>	OpDiv Analyst: Joshua Mosios (Contractor)	<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>	9/23/2024
		<b>SOP Days Open:</b>	3

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	9/24/2024
<b>Agency Privacy Analyst Review Comments:</b>	<p>Reviewer: Nestor Villafuerte</p> <p>9/24/2024 The current OMB Control number has expired and CDC is awaiting final approval and approval date. All comments have been addressed. This PIA is ready for SAOP review and approval.</p> <p>9/4/2024 Per CDC email (see Supporting Documentation), request we reject the PIA to response to the following:</p> <p>PIA-10B: The OMB expiration date has passed, is the OMB number currently being renewed? Or is there a new OMB number with a new expiration date? Please update accordingly.</p>	<b>Agency Privacy Analyst Days Open:</b>	1

### SAOP Review

<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	Archer Signature_Bridget Guenther.docx
<b>SAOP Comments:</b>	9/24/2024 The current OMB Control number has expired and CDC is awaiting final approval and approval date.	<b>SAOP Review Date:</b>	10/1/2024
		<b>SAOP Days Open:</b>	7

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
Re_ CDC - eIPP - QTR2 - 2023 - CDC6736134.pdf	225622	.pdf	9/4/2024 2:11 PM	1

Comments				
Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmc dc	8/7/2024	Email address, mailing address, and phone number are all available in the multiple-choice field. Please delete from other and make appropriate selections.	
PIA - 9	Data Feed Service, piafrmc dc	8/7/2024	Per the previously approved PIA, previous sources included Government (1) State, Local, Tribal and (2) Foreign and Non-Government (1) Members of the Public and (2) Private sector. Are these no longer valid data sources? If so, please add a comment to the record explaining why. If they are still valid, please select them.	
PIA - 18	Data Feed Service, piafrmc dc	8/7/2024	Please specify whether the contracts are direct (badged) or indirect (non-badged) and whether they fall under the classification of user, administrator, developer, or other.	
PIA - 23	Data Feed Service, piafrmc dc	8/7/2024	This citation is no longer valid. Please review the current CDC Records Control Schedule here <a href="#">Records Control Schedules   National Archives</a> .	
PIA - 1	VILLAFUERTE, NESTOR	9/4/2024	Reviewer notes that the ATO date is missing. Please provide a response to PTA-5B	
PIA - 10B	VILLAFUERTE, NESTOR	9/4/2024	Reviewer notes that the OMB expiration date has passed, is there a new OMB number?	
PIA - 1	BLAND, CRYSTAL	9/4/2024	Disregard the previous comment as we noted the following:  ATO Date: 6/26/2023  PTA-5A: uses SAMS for user credentials (PIV) so don't need to respond to PTA-5B.	
PIA - 10B	Data Feed Service, piafrmc dc	9/5/2024	OMB is currently reviewing the forms and we are waiting on the final approval and approval date.	
PIA - 10C	Data Feed Service, piafrmc dc	9/20/2024	From center: OMB is currently reviewing the forms and we are waiting on the final approval and approval date.	

### 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:	10/1/2024 8:01 PM	History Log:	<a href="#">View History Log</a>
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