

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 - FOIA - QTR1 - 2024 - CDC8003103	PIA ID:	1782341
Name of Component:	CDC - Freedom of Information Act Tracking System	Name of ATO Boundary:	Freedom of Information Act Tracking System
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	55
Submission Status:	Re-Submitted	Submit Date:	3/21/2024
Next Assessment Date:	N/A	Expiration Date:	4/29/2027
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC8003103
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.		6/29/2024
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.	PIA Validation (PIA Refresh)
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	System is changing from On-premises servers to a SaaS Cloud provider.
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.	The system provides the CDC the ability to respond track and process Freedom of Information Act (FOIA) requests. It also provides the storage mechanism to store responsive records as well as disseminate the responsive records to the requesters.

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.	<p>The system will collect:</p> <p>FOIA/Privacy Act (PA) requests and appeals received in the CDC FOIA Office by mail, phone, or fax, or online through the system's Public Access Link (PAL), from individual and entity requesters or by referral from another FOIA office (containing requester or appellant name and contact information (mailing address, email address and/or telephone number) and a description of the records requested and issues raised on appeal); Responses to requests and appeals (containing requester or appellant name and mailing address or email address, a summary of the request history, the number of pages of responsive records located, released, and pages or portions withheld, an explanation of the exemptions applied to the withheld portions, the agency's decision on any appeal issues, and a notice of appeal rights); Intra- and inter-agency communications about requests (containing contact information for agency personnel and the requester/appellant and any information conveyed, pertaining to issues such as which offices could have responsive records, search or processing status, types and quantities of records located, reasons for delays, and estimated time-frames); Case tracking information (containing requester/appellant name, case tracking number, and processing stages such as date request received, date response due, number of days overdue, whether the response deadline is tolled (stopped), date records received, date response letter submitted for signature, date response provided, FOIA Analyst assigned to request); Form letters and report templates; Statistical and narrative reports; Records used to administer users' access to the system.</p>
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.	<p>The following information below is collected and stored within the FOIA system, Names, email, phone number, mail, phone, or fax number. The above information is used to create FOIA account and to also follow the progress of the FOIA request. Other data is used for processing FOIA/PA requests.</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)?	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.	<ul style="list-style-type: none"> - The websites classify as other is for internal CDC FOIA team. - The publicly available website is used to apply for FOIA request, in order to create an account the user needs to complete the access request form by submitting the following information; - Name - Address - Email address -Phone number - Organization - Job title
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?	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.	<ul style="list-style-type: none"> Social Security Number Truncated SSN Name Mother Maiden Name Email Address Phone numbers Medical records (PHI) Certificates Education Records Military Status Foreign Activities Taxpayer ID Date of Birth Photographic Identifiers Biometric Identifiers Vehicle Identifiers Mailing Address Medical Records Number Financial Account Info Legal Documents Devices Identifiers Employment Status Passport Number User Credentials Patient ID Number Driver License Number Other - Free text Field - User Credential (Public) Others - Chart No., TIN, DUNS, Provider License #
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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 Grantees Patients Members of the public Vendors/Suppliers/Third-Party Contractors (Contractors other than 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?	The primary purpose for the PII is to contact and provide responses to requesters.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	Secondary uses of the PII is to prepare internal reports as required by management or CDC counsel.
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	Though not actively collected by this system, it is possible that SSNs are contained within pre-existing agency records processed for release under the FOIA using the system. The SSN, however, is not used by the system in any manner. When present, its functions would be to verify the requester's identity, locate responsive records, distinguish between records about individuals with the same name or associate records that are under different names but are about the same individual but only when no other information will suffice as an alternative to using SSN.
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	E.O. 9397, as amended by E.O.13478
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	5 U.S.C. 552, 552a; 44 U.S.C. 3301
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.	Name, email address and phone number
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.	09-90-0058, Tracking Records and Case Files for FOIA and Privacy Act Requests and Appeals.

PIA - 9:	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"> In-person Hard Copy Mail/Fax Phone Email Online <p>Government Sources</p> <ul style="list-style-type: none"> Within the OPDIV Other HHS OPDIV State/Local/Tribal Foreign Other Federal Entities <p>Non-Government Sources</p> <ul style="list-style-type: none"> Members of the Public Commercial Data Broker Public Media/Internet Private Sector
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.	The information collected in the system is not from the general public but from agency related duties.
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.	<ul style="list-style-type: none"> Other Federal Agency/Agencies Private Sector State or Local Agency/Agencies Within HHS

PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	<p>Within HHS; PII may be shared in order to route and process the request, as well as to locate records pertaining to individuals.</p> <p>Other Federal Agency/Agencies; To effect consultations and referrals involving individual requestors and/or requested records containing PII.</p> <p>State or Local Agency/Agencies; To ascertain facts or potential resultant harms affecting whether an exemption applies to information involving that state of local agency. Purpose.</p> <p>Private Sector; To comply with the submitter notice process with respect to financial or commercial records containing PII - this process shares with the submitter the records that the submitter originally provided to CDC but may also share the identity of the requester.</p>
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)).	N/A. Information disclosures are pursuant to Routine Uses listed in 09-90-0058, Tracking Records and Case Files for FOIA and Privacy Act Requests and Appeals.
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.	N/A. The system is excepted from the Privacy Act "accounting of disclosures" requirement.
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.	<p>An individual requester can choose which contact information to provide to the FOIA office and which method to use to submit a request (e.g., need not use the online method). A third-party requester can make a request anonymously through a nominee. A first-party requester can limit the type, number, date range, subject matter, etc., of records requested about himself/herself, and need not provide SSN or other identification information if other information is sufficient to locate the requested records and verify the requester's identity.</p> <p>An individual whose PII is in records responsive to a FOIA request has no option to object to the inclusion of the records in the system. However, some information may be redacted before providing to a requester.</p>

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.

Major changes to the system would be published in a revised System of Records Notice (SORN) for Privacy Act system 09-90-0058 Tracking Records and Case File for FOIA and Privacy Act Requests and Appeals.

Also, the FOIA consent forms would be modified to reflect any changes in the disclosures or data uses.

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.

An individual's concern that his/her PII was inappropriately released to a FOIA requester would be reported within CDC as a privacy incident and would be investigated and analyzed by the CDC Privacy Officer to determine if an improper disclosure occurred. At the conclusion, the concern would be responded to in writing, and remedial measures would be taken if determined that an improper disclosure occurred.

Although this system is excepted from the Privacy Act "accounting of disclosures" requirement, an individual can make a FOIA request for the FOIA request log to identify any individuals and entities requesting records about him/her, a description of the records requested, and the dates of the requests.

An individual requester who believes that his/her contact information or other information about his/her request is inaccurate in the system can contact the CDC FOIA Office or System Manager identified in SORN 09-90-0058 to request access to the records and contest and seek correction of any inaccurate information. Requesters submitting requests online can update or correct their profile information, including their contact information, at any time.

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.	<p>An individual's concern that his/her PII was inappropriately released to a FOIA requester would be reported within CDC as a privacy incident and would be investigated and analyzed by the CDC Privacy Officer to determine if an improper disclosure occurred. At the conclusion, the concern would be responded to in writing, and remedial measures would be taken if determined that an improper disclosure occurred.</p> <p>Although this system is excepted from the Privacy Act "accounting of disclosures" requirement, an individual can make a FOIA request for the FOIA request log to identify any individuals and entities requesting records about him/her, a description of the records requested, and the dates of the requests.</p> <p>An individual requester who believes that his/her contact information or other information about his/her request is inaccurate in the system can contact the CDC FOIA Office or System Manager identified in SORN 09-90-0058 to request access to the records and contest and seek correction of any inaccurate information. Requesters submitting requests online can update or correct their profile information, including their contact information, at any time.</p>
PIA - 17:	Identify who will have access to the PII in the system.	<p>Users</p> <p>Administrators</p> <p>Contractors</p>
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; FOIA Office staff and FOIA Coordinators will have access to PII pertaining to requests they handle, for purposes of processing the requests.</p> <p>Administrators; Administrators will have access to PII for purposes of maintaining and updating the system, administering user access, and troubleshooting system problems.</p> <p>Contractors; The system direct contractor will have access to PII for purposes of maintaining and updating the system, administering user access, and troubleshooting system problems. Any direct contractor retained to assist the OS FOIA Office with processing requests and appeals would have access to PII for purposes of providing that assistance.</p>

PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Each user's access will be determined based on the user's role; for example: Each CDC FOIA Office staff member will have access to all or most records; Each CDC FOIA Coordinator will have access to only his/her center/program office's communications and records;
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.	Access to PII is restricted by role management within the application through the use of the CDC Active Directory.
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 receive initial and annual CDC Security and Privacy Awareness Training.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	None
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).	The applicable records schedule is Transmittal number 34 GRS 4.2 (General Service Record), pursuant to which: 1. Case files are retained for two years and then securely destroyed when access to all requested records is granted. 2. Case files are destroyed after six years when access to all or part of the records is denied. 3. In the event of an appeal, the files are destroyed six years after final determination by the Department, or three years after final adjudication by the courts, or six years after the time at which a requester could file suit, whichever is later. 4. Correspondence control logs are destroyed six years after the date of last entry. Disposal methods include erasing computer tapes, and burning or shredding paper materials.
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: User access will be limited based on role and least privileged, and will be controlled via Active Directory. PIV card authentication with uniquely identified users is used to restrict access to only the authorized staff. Annual Privacy and Security training are required for all CDC personnel. Technical: All CDC laptops and workstations employ whole disc encryption. CDC users must first log onto the CDC network with their personal identify verification (PIV) card, using a CDC-issued laptop or device. Data at Rest is encrypted at the file level. Physical: The buildings and offices where the system servers are located and where CDC workstations used to access the system are located, are secured by locks, I.D. badges and security guards. All files are secured in a building with guards at entry points.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	3/21/2024
Privacy Analyst Comments:	OpDiv Privacy Analyst: Joshua Mosios Status: Approved Date: March 21 2024	Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	Approved on behalf of Beverly Walker	SOP Review Date:	3/25/2024
		SOP Days Open:	4

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	3/27/2024
Agency Privacy Analyst Review Comments:	Reviewer: Shanai Shobowale Please see supporting documentation about user credentials for PTA-5A. Provided comments for the next update on the PTA. This PIA is ready for SAOP review and approval. Updates for the next iteration of the PTA: PTA-5: Please list the PII elements that could possibly be collected as it is listed in PIA-1. Remember PTA-5 and PIA-1 should mirror each other. Include both type of credentials use for internal and the public in your response. PTA-5A and PTA-5B: Please note that the responses are blank. PTA-5B: Select both type of credentials use for internal and the public in your response.	Agency Privacy Analyst Days Open:	2

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:	<p>Updates for the next iteration of the PTA:</p> <p>PTA-5: Please list the PII elements that could possibly be collected as it is listed in PIA-1. Remember PTA-5 and PIA-1 should mirror each other. Include both type of credentials use for internal and the public in your response.</p> <p>PTA-5A and PTA-5B: Please note that the responses are blank.</p> <p>PTA-5B: Select both type of credentials use for internal and the public in your response.</p>	SAOP Review Date:	4/29/2024
		SAOP Days Open:	33

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
CDC_FOIA_PIA.pdf	299700	.pdf	3/27/2024 2:33 PM	0

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 23	Data Feed Service, piafrmcdc	3/19/2024	Update the GRS citation. There is no section 23.	
PIA - 23	Data Feed Service, piafrmcdc	3/20/2024	14 is also outdated. Old GRS 14 Superseded (archives.gov)	
PIA - 1	BLAND, CRYSTAL	3/27/2024	<p>Updates for the next iteration of the PTA:</p> <p>PTA-5: Please list the PII elements that could possibly be collected as it is listed in PIA-1. Remember PTA-5 and PIA-1 should mirror each other. Include both type of credentials use for internal and the public in your response.</p> <p>PTA-5A and PTA-5B: Please note that the responses are blank.</p> <p>PTA-5B: Select both type of credentials use for internal and the public in your response.</p>	
PIA - 1	Data Feed Service, piafrmcdc	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 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:	9/30/2024 8:01 PM	History Log:	View History Log
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