

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 - HP Assist - QTR1 - 2024 - CDC8059282	PIA ID:	1795936
Name of Component:	CDC - Health Physics Assistant	Name of ATO Boundary:	Health Physics Assistant
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	67
Submission Status:	Re-Submitted	Submit Date:	5/6/2024
Next Assessment Date:	N/A	Expiration Date:	1/1/2100
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC8059282
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.		5/30/2024
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.	None.
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.	Office of Laboratory Science and Safety uses the Health Physics Assistant (HP Assist) system for tracking of radioactive materials (RAM) to an individual through a permit system. The permit allows the user to identify which workers, labs, inventory type, and conditions are associated with the compliance process. Once these key factors are entered, the amendment process controls the continual updating of this process. This amendment process includes initial entry, renewal amendment and termination during the life cycle of the permit. Each amendment will include the appropriate approval process along with a historical register that will indicate the additions, changes and deletions to the permit. It includes who made the change along with when and why.

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.	HP Assist contains user id which is used to identify and authenticate participating members, track training, material usage and inventory under the individual's control. The system data is not shared with any other system. Names, phone numbers, and email addresses are collected.
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.	The Environment, Safety, And Health Compliance Office uses the Health Physics Assistant (HP Assist) system for tracking of radioactive materials (RAM) to an individual through a permit system. HP Assist is the link that controls all subsequent files together into a highly integrated system. The permit allows the user to identify which workers, labs, inventory type, and conditions are associated with the compliance process. Once these key factors are entered, the amendment process controls the continual updating of this process. This amendment process includes initial entry, renewal amendment and termination during the life cycle of the permit. Each amendment will include the appropriate approval process along with a historical register that will indicate the additions, changes and deletions to the permit. It includes who made the change along with when and why. Radiation workers at CDC must fill out a license to use radioactive materials (RAM) and get approved to purchase and use these materials through the Radiation Safety Officer (RSO). HP Assist contains user id which is used to identify and authenticate participating members, track training, material usage and inventory under the individual's control. The system data is not shared with any other system. All records must be maintained permanently. User name and passwords are not collected or stored.
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)?	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.	The purpose of the website is for the Environment, Safety, And Health Compliance Office to use the Health Physics Assistant (HP Assist) web application for tracking of radioactive materials (RAM) to an individual through a permit system. HP Assist is the link that controls all subsequent files together into a highly integrated system. The permit allows the user to identify which workers, labs, inventory type, and conditions are associated with the compliance process. Once these key factors are entered, the amendment process controls the continual updating of this process. Access to this website is limited to CDC agency users who have been granted approval. Access is through internal CDC network only with credentials required for the website to resolve. No banner is present as the website cannot be resolved without credentials.
PTA - 10:	Does the website have a posted privacy notice?	No
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.	Name Email Address Phone numbers User Credentials
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.	51 - 200
PIA - 4:	For what primary purpose is the PII used?	To identify and authenticate participating members.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	To track training, material usage, and inventory under the individuals control.
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	N/A, SSN is not collected
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	N/A, SSN is not collected
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	Nuclear Regulatory Commission (NRC) Regulations Title 10, Code of Federal Regulations, Part 2, Part 10 and Part 95.
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.	Directly from an individual about whom the information pertains In-person Hard Copy Mail/Fax
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.	No information is collected from the public.
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.	If the individual chooses to opt out, they cannot work with Radioactive Materials (RAM). It is required of the Radiation Safety Officer (RSO) by Nuclear Regulatory Commission (NRC) to track usage, permits, and disposal of RAM by each individual. Personally Identifiable Information (PII) must be provided and monitored, in order to be exposed to radioactive materials.
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.	If changes occur in HP Assist, the RSO and CDC Radiation Safety Committee will notify all RAM users through email, Training classes, or in person.
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.	Each worker can contact the Radiation Safety Officer (RSO) or staff directly via email to resolve PII concerns. The Radiation Safety Team can be reached at radiationsafety@cdc.gov or the Radiation Safety Committee at rsc@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 Radiation Safety Officer (RSO) will periodically review the data and compare with what is in his records. Users are also able to input their data and update as needed.
PIA - 17:	Identify who will have access to the PII in the system.	Administrators
PIA - 17A:	Select the type of contractor.	
PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	
PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Administrators require full access to all system information (including PII) in order to complete system updates and make necessary changes.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Radiation Safety Program staff will have access to PII. Only the RSO and his staff (3 people total) may add and/or edit information in HP Assist which includes PII. The staff has access to assist with documenting each individual filing for approval to access radioactive materials. The RSO has access to PII to approve each applicant. Each staff member has access to PII although each user can only view their own information.

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.	HP Assist allows users to be granted a level of access to enter and see only their data. The CDC Clinic personnel will be granted access to view the dosimetry data only. Only the RSO and his staff will be granted the highest level of access to add or edit information. Least privilege model is used .
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.	Annual Security and Privacy Awareness Training
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	All new staff will be trained on how to use HP Assist as well as issues pertaining to privacy and confidentiality. All HP Assist users will be updated throughout the year on HP Assist procedures, including privacy and confidentiality.
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).	<p>1-13 Forms Management Files, (N1-442-95-1, Item 1): These files consist of a camera-ready copy of CDC forms and routine related records maintained in the Management Analysis and Services Office, (MASO), Office of Program Services (OPS). The forms support a wide variety of administrative and scientific purposes, and data collection efforts. The blank forms are managed by MASO to ensure compliance with CDC Policy and for printing and distribution purposes.</p> <p>Authorized Disposition: a. Forms. Cutoff obsolete forms at the end of the calendar year. Transfer to the Federal Radiation Council (FRC) 2 years after cutoff. It is destroyed when it is 10 years old.</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.	<p>Administrative: Approved Security Authorization, user manuals, and least privilege access controls.</p> <p>Technical: User ID/ Password, Firewall, and PIV credentials are in place.</p> <p>Physical: Guards are in place, as well as ID badges, Key Cards and CCTV.</p>

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	5/13/2024
Privacy Analyst Comments:	OpDiv Privacy Analyst: Joshua Mosios	Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	Approved on behalf of Beverly Walker	SOP Review Date:	5/6/2024
		SOP Days Open:	0

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	5/23/2024
Agency Privacy Analyst Review Comments:	Reviewer: Shanai Shobowale 5/21/2023 This PIA is ready for SAOP review and approval.	Agency Privacy Analyst Days Open:	17

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:	PTA-5A and PTA-5B did not sync in the OIS instance.	SAOP Review Date:	5/31/2024
		SAOP Days Open:	8

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments				
Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmcdc	4/1/2024	Add User ID	
PIA - 7	Data Feed Service, piafrmcdc	4/1/2024	Add specific citation	
PIA - 15	Data Feed Service, piafrmcdc	4/1/2024	Remove PII and replace with organization address/number	
PIA - 24	Data Feed Service, piafrmcdc	4/1/2024	What is ISAT?	
PIA - 7	Data Feed Service, piafrmcdc	5/1/2024	What does NCR stand for?	
PIA - 1	BLAND, CRYSTAL	5/21/2024	Reviewer noted on this iteration of the PTA: PTA-5A and PTA-5B did not sync in the OIS instance.	
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 Agency Privacy Analyst Approve ?:	1	Is SOP Return ?:	0
Is SAOP Approved?:	1	Is Agency Privacy Analyst Return ?:	0
Total Approved:	4	Is SAOP Return ?:	0
Total Approval Required:	4	Total Return:	0

Miscellaneous Fields	
Last Updated:	9/30/2024 8:01 PM
History Log:	View History Log