

## 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 - CDC-INFO CCD - QTR2 - 2024 - CDC8301191	<b>PIA ID:</b>	1889838
<b>Name of Component:</b>	CDC - CDC-INFO Contact Center Data	<b>Name of ATO Boundary:</b>	CDC-INFO Contact Center Data
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	79
<b>Submission Status:</b>	Re-Submitted	<b>Submit Date:</b>	6/10/2024
<b>Next Assessment Date:</b>	08/22/2027	<b>Expiration Date:</b>	8/22/2027
<b>Office:</b>		<b>OPDIV:</b>	CDC
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	CDC8301191
<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.	<b>Disposition</b>	
<b>2:</b>	Is this a FISMA-Reportable system?	<b>Yes</b>	
<b>3:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	<b>Yes</b>	
<b>4:</b>	ATO Date or Planned ATO Date.	<b>1/3/2026</b>	
<b>5:</b>	Is the system or electronic information collection, agency or contractor operated?	<b>Agency</b>	

## PTA

### PTA

<b>PTA - 2:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.	<b>PIA Validation (PIA Refresh)</b>
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	<b>N/A</b>
<b>PTA - 3:</b>	Is the data contained in the system owned by the agency or contractor?	<b>Agency</b>
<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.	<b>The CDC-INFO CCD responds to inquiries from the general public. CDC-INFO CCD National Contact Center (NCC) is used to automate the import the data collected by the CDC-INFO CCD into a CDC-managed database and allow for quality monitoring and reporting of CDC-INFO NCC interactions with these customers. The goal is to ensure the customer service representatives at the NCC are providing accurate information and are upholding the high standards of publicly representing the CDC.</b>

<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>Data is collected through audio and text. Customers relying on telephone-based inquiries are instructed not to provide PII during their inquiry, but PII providing inadvertently is captured on their call recording through customer interaction with the contact center agents. The metadata accompanying the inquiry will consist of the following: Description of the issue, phone number, email, record disposition, request origin, date(s) of the request, comments, responder's name, caller's name, Prepared Responses (PR) used, inquiry description, topic, status, level of escalation.</p> <p>There are no HHS credentials used to access the system, and no user credentials are collected by this system. The system's authentication utilizes the Personal Identity Verification (PIV) via CDC network's Active Directory (AD), which has its own approved Privacy Impact Assessment (PIA).</p>
<b>PTA - 5A:</b>	Are user credentials used to access the system?	
<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 will be used to automate the import the data collected by the CDC-INFO CCD into a CDC-managed database and allow for quality monitoring and reporting of CDC-INFO NCC interactions with these customers. CDC-INFO CCD will share this data only with CDC staff authorized by the CDC-INFO team. This allows other CDC programs to evaluate the quality of their prepared responses and to ensure the customer service representatives are providing accurate information.</p> <p>The system's authentication utilizes Personal Identity Verification (PIV) via CDC network's Active Directory (AD).</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)?	Yes
<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.	<p>The system is used to automate the import the data collected by the CDC-INFO CCD into a CDC-managed database and allow for quality monitoring and reporting of CDC-INFO NCC interactions with these customers. CDC-INFO CCD will share this data only with CDC staff authorized by the CDC-INFO team. This allows other CDC programs to evaluate the quality of their prepared responses and to ensure the customer service representatives are providing accurate information. The system's authentication utilizes the Personal Identity Verification (PIV) via CDC network's Active Directory (AD).</p>
<b>PTA - 10:</b>	Does the website have a posted privacy notice?	No

<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?	No
<b>PTA - 12A:</b>	Select the type(s) of website measurement and customization technologies in use and if it is used to 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

<b>PIA</b>		
<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 Other - Free text Field - • Description of the issue <ul style="list-style-type: none"> <li>• record disposition</li> <li>• request origin</li> <li>• date(s) of the request</li> <li>• comments</li> </ul>

<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Members of the public
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	Customers relying on telephone-based inquiries are instructed not to provide PII during their inquiry, but PII providing which can be inadvertently captured during call recording. The PII being collected is not directly being used. Recordings and textual data collected from customers interactions with CDC-INFO National Contact Center (NCC) is only used for quality monitoring and reporting of NCC interaction with these customers. The goal is to ensure the customer service representatives at the national contact center are providing accurate information and are upholding the high standards of publicly representing the Centers for Disease Control and Prevention.
<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 Service Act, 42 U.S. Code § 300u.
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	No
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	
<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.	
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains  Phone  Email  Non-Government Sources  Members of the Public
<b>PIA - 10:</b>	Is there an Office of Management and Budget (OMB) information collection approval number?	No
<b>PIA - 10A:</b>	Provide the information collection approval number.	
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	
<b>PIA - 10C:</b>	Explain why an OMB information collection approval number is not required.	OMB approval is not required as postal and e-mail information is used for contact or response purposes only.
<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.	N/A

<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)).	N/A
<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.	<p>This system does not collect PII at its point of origin. The systems that do collect this information have notification mechanisms in place:</p> <p>For phone calls, a recorded message is played prior to the user speaking with a correspondent ("Please hold for the next available representative. Your call may be monitored or recorded for quality assurance. At the end of the call, please stay on the phone for a brief customer service survey"). If an inquiry needs to be escalated to CDC for a response, the agent says "I do not have information on this specific question/comment, so I will need to send your question in an e-mail to the experts at CDC who work more closely with this topic. They will respond to you in the next few days. Would you like to go ahead with this process? If so, I need to collect some contact information, including your email address, so that the CDC program can get back to you with a response".</p> <p>For all other inquiries, the CDC Privacy Policy is referenced in the CDC website.</p>
<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.	This system does not collect PII at its point of origin. However, the systems that do capture this information have features that allow opting out (1) For phone calls, callers can use voice channel - voluntary (*67 phone number block feature allows callers anonymity; individuals do not have to provide PII if their question can be answered by a CDC-INFO agent); (2) for email, customers must supply an email address for a response but can otherwise avoid providing additional PII in their inquiry.
<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.	This system does not directly collect PII. The system that collects web-based submissions displays a disclaimer ("The information you provide will only be used to respond to your inquiry") along with the link to the CDC Privacy Policy. Telephone-based inquirers are played a message indicating that their call is being recorded for quality control purposes.

<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 individual users may report all concerns about any suspicious activity, disclosure of group email, and/or phone numbers to the representatives at: In Atlanta: 404-639-4282 or 404-639-7258 In Hyattsville: 301-458-4583 In Pittsburg: 412-386-6156
<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.	Periodic reviews of PII content are not required, as PII is only captured in conjunction with customer inquiries. Once an inquiry has been closed out, there is no further activity on the inquiry. Inquiries are archived in conjunction with the data retention rules. In special cases, call recordings may be reviewed after an inquiry has been closed out.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Users Administrators Developers Contractors
<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?	No
<b>PIA - 18:</b>	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Users - CDC internal employees providing reports and quality monitoring  Administrators - CDC internal employees providing authorizations and managing reports  Developers - CDC internal employees configure and updates the system code.  Contractors - CDC internal employees which are direct contractors provide contractual work on monitored and recorded calls for quality assurance that may potentially hear PII.
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Access to PII is role based. Role assignment is managed by the The Contact Center Manager and Site Leads will interview/evaluate customer service representatives (CSR) candidates and make hiring recommendations. The Program Manager approves all staff hiring. Access privileges are role based. Approved staff are assigned to specific roles and all associated privileges required to fulfill role responsibilities. CSR and system administrators require access to PII in the normal performance of their duties. Staff not in these roles are not granted access into the system.

<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.	Internal users are authenticated via Active Directory and Personal Identification Verification (PIV) card using the role-based access control, and least privilege methods to ensure that those with access to PII can only access the minimum amount of information necessary to perform their job duties. Access by CDC staff to this application is strictly controlled. CDC staff may only listen to audio recordings they have been explicitly assigned to listen to by CDC-INFO administrators. This assignment occurs based on CDC user ID and can only be done on a case-by-case basis. All authorizations to listen to audio recordings are time-limited (that is, the authorizations expire after a set number of days, typically 14 to 30). The media player implements coding measures that prevent users from saving the audio recording to disk.
<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 employees are required to complete an Annual Security and Privacy Awareness Training per CDC-wide IT policy. Additionally, a Terms of Use screen is displayed at least once per day when using the system, requiring users to agree to non-disclosure and other behaviors that are designed to help protect the information.
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	Users will receive enhanced privacy training that explains the practices and procedures related to the handling of PII specific to CCD.
<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 retention for this system is specified in General Records Schedule 4.2 , which requires data destruction when 90 days old, unless required for business use. System business stewards have requested longer retention to ensure data is available for reporting or to provide to legal authorities, if requested.

**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.

The controls relate to the access roles managed within the system.

1) Administrative: Access is role based and the system cannot be accessed except by membership in a role group (admin). CDC-INFO system administrators will use the web application to grant, extend, or revoke a CDC user's authorization to select audio recordings and the recordings' associated metadata. Administrators must specify a time limit for each authorization they grant, after which the user is unable to listen to that recording.

2) Technical controls include use of PIV cards to access the network/system and thereafter identify users within their roles of responsibility. The OCIO ISB (Office of the Chief information Officer) (Infrastructure Services Branch) Consolidated Web Services has provided the system with a secure File Transfer Protocol (FTP) server implementing the Secure FTP protocol, thus providing security of the data while in transit. OCIO ISB Infrastructure Consolidated Database Services has also provided encrypted file servers and an encrypted database server for providing security of the data at rest.

3) Object-based access controls are used to ensure users may only access specific resources to which they have been granted authorization. For instance, one user may be authorized to listen to a given MP3 file, but another user (even in the same role) may not have the same authorization.

4) Physical controls include limited access to the application servers and the database servers, which are behind locked doors controlled by PIV card and Security Guards.

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	6/13/2024
<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>	7/15/2024
		<b>SOP Days Open:</b>	35

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	7/19/2024
<b>Agency Privacy Analyst Review Comments:</b>	<p>Reviewer: Crystal Bland</p> <p>This PIA had minor comments but is ready for SAOP review and approval.</p> <p>Per CDC email (see Supporting Documentation), this system is migrating from a Stand-Alone Component to a Sub-Component within the ISB Infrastructure. In addition to this system having its own PTA/PIA, ISB Infrastructure will have its own approved PTA.</p>	<b>Agency Privacy Analyst Days Open:</b>	4

### SAOP Review

<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	Archer Signature_Bridget Guenther.docx
<b>SAOP Comments:</b>	<p>This PIA had minor comments but is ready for SAOP review and approval.</p> <p>Per CDC email (see Supporting Documentation), this system is migrating from a Stand-Alone Component to a Sub-Component within the ISB Infrastructure. In addition to this system having its own PTA/PIA, ISB Infrastructure will have its own approved PTA.</p>	<b>SAOP Review Date:</b>	8/22/2024
		<b>SAOP Days Open:</b>	34

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
8-8-2024_EMAIL_Re_CDC - CDC-INFO CCD - QTR2 - 2024 - CDC8301191.pdf	349793	.pdf	8/8/2024 11:02 AM	0

## Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 4	Data Feed Service, piafrmcdc	6/10/2024	You can delete all but the last 2 sentences.	
PIA - 15	Data Feed Service, piafrmcdc	6/10/2024	Please update answer.	
PIA - 1	BLAND, CRYSTAL	7/19/2024	<p>On the next iteration of the PTA:</p> <p>PTA-5A: Per PTA-5, should mark "Yes, but user credentials are maintain by another system."</p> <p>PIA-1 remove bullets in the free text as they're not 508 compliance.</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 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 4:01 PM	History Log:	<a href="#">View History Log</a>
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