

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 - CDC-INFO-WFV - QTR2 - 2024 - CDC8069861	PIA ID:	1801523
Name of Component:	CDC - CDC-INFO-Web Form Validator	Name of ATO Boundary:	CDC-INFO-Web Form Validator
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	73
Submission Status:	Re-Submitted	Submit Date:	4/10/2024
Next Assessment Date:	06/14/2027	Expiration Date:	6/14/2027
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC8069861
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.		4/24/2025
5:	Is the system or electronic information collection, agency or contractor operated?		Contractor

PTA

PTA		
PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	None
PTA - 3:	Is the data contained in the system owned by the agency or contractor?	Contractor
PTA - 4:	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions.	CDC-INFO-WFV provides the general public with a mechanism to submit questions to be answered by CDC Subject Matter Experts. DCS-WFV collects user meta-data and the public individual's inquiry, and then forwards the user information and their question to the CDC-INFO Call Center for processing.

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>CDC-INFO-WFV will collect information relating to a customer's inquiry to CDC. To ensure valid submissions, a required CAPTCHA challenge is issued once the form is completed. This system does not require or collect user IDs or passwords. At a minimum, a user must:</p> <ol style="list-style-type: none"> 1) provide a general subject for their inquiry. 2) select an appropriate user type from a drop down list. 3) provide and confirm the email address. 4) provide the text of their question; and, 5) provide optional PII data for official response on inquiries via mailed-in letter. <p>Optional information that can be collected for hard physical response by letter in reference to the individual's question or inquiry. A physical letter will be auto-generated along with the response from the Subject Matter Expert utilizing the information below:</p> <ol style="list-style-type: none"> 1) Name; 2) Title / Occupation; 3) Organization / Company; 4) Check box for the Department of Health association; 5) Phone number (company contact); 6) E-mail (company email); and, 7) Address (company's physical address)
PTA - 5A:	Are user credentials used to access the system?	No
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 system does not retain or store personal information due to lack of storage database for servers. The email is used for automated response that inquiry has been received.</p> <p>The optional data information is shared with the CDC's Subject Matter Expert with the limitation on the general subject of the inquiry, the body of the inquiry, and company association based on the inquiry for SME usage.</p>
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	
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.	WFV provides the general public with a mechanism to submit questions to be answered by CDC Subject Matter Experts. This system does not require authentication through PIV or SAMS based on MFA requirements. CDC-INFO WFV collects user meta-data and their question, performs a CAPTCHA validation to prevent invalid entries and then forwards the user information and their question to the CDC-INFO Call Center for processing. The system uses captcha externally for anonymous users. There are no accounts for the system. It is public-facing, anonymous access. No multi-factor authentication (MFA) required. ISB utilizes MFA for network access on privileged accounts via the CDC Active Directory system which uses ALT Cards and have a CISO-approved exception process for systems and/or devices that still need to use User IDs/passwords, which creates Kerberos tokens to perform Identification and authorization before allowing network access for privileged accounts.
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?	Yes
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	Session Cookies - Does Not Collect PII
PTA - 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA - 13A:	Does the website collect PII from children under the age thirteen?	
PTA - 13B:	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PTA - 14:	Does the system have a mobile application?	No
PTA - 14A:	Is the mobile application HHS developed and managed or a third-party application?	
PTA - 15:	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
PTA - 16:	Does the mobile application/ have a privacy notice?	
PTA - 17:	Does the mobile application contain links to non-federal government websites external to HHS?	
PTA - 17A:	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
PTA - 18:	Does the mobile application use measurement and customization technology?	
PTA - 18A:	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
PTA - 19:	Does the mobile application have any information or pages directed at children under the age of thirteen?	
PTA - 19A:	Does the mobile application collect PII from children under the age thirteen?	

PTA - 19B:	Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PTA - 20:	Is there a third-party website or application (TPWA) associated with the system?	No
PTA - 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

PIA		
PIA		
PIA - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address Phone numbers Mailing Address Other - Free text Field - Title/Occupation; organization/Company; and Department of Health Association.
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Members of the public
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
PIA - 4:	For what primary purpose is the PII used?	The e-mail address and phone number are used to respond to the general public inquiries for CDC-INFO Call Center. If the public individual fills out the optional data information, a hard-copy response is generated based on the individual's name and company address. The CDC Subject Matter Expert responds directly to the public individual regarding his/her science-based inquiries. The optional data information is shared with the CDC's Subject Matter Expert (SME) with the limitation on the general subject of the inquiry, the body of the inquiry, and company association based on the inquiry for SME usage.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	N/A
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	N/A
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	N/A
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	Public Health Service Act, 42 U.S. Code § 300u-3
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 Online Non-Government Sources Members of the Public
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.	Public use service and no database.
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.	The public individual is not required to fill the optional information form. The site can still provide a response to the public individual via e-mail or by phone. PII in the form of Email address is required. If they do not wish to utilize this system, the user has the option to call the CDC-INFO Contact Center directly.
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.	The system does not require consent from individuals and notification cannot be implemented due to lack of storage of data information. Data collected with each inquiry is used to respond to that specific inquiry and is not used again. Inquirers will not be affected by any system changes.

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.	In most cases, unauthorized disclosure of customer service information will have at most a limited adverse effect on agency operations, assets, or individuals. There are no resolution process since the PII information is not stored and limited to immediate email or phone response. The left-side navigation menus on the page contain a "Contact CDC-INFO" section, which alerts the user of how to contact CDC via telephone. The page also includes a link to the CDC Privacy policy (https://www.cdc.gov/other/privacy.html), which explains how the data, voluntarily provided by the user, will be used. The privacy policy also provides multiple methods for the user to contact CDC if they have questions or concerns regarding the data they (the user) provides.
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.	No periodic reviews of PII since the responses are limited time to respond on general public inquiry. 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.
PIA - 17:	Identify who will have access to the PII in the system.	Others
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.	The CDC-INFO National Call Center will import the data sent to them via email from the system. This system has no interface to view PII.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The data routed to CDC-INFO National Call Center are controlled by role-based and rule-based access control allows the CDC center data owners have full control of their own document access rights and distribution audience.
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.	CDC-INFO National Call Center 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. The system developers do not have data access to call center, simply the system routes the data.
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.	Staff at the CDC-INFO National Call Center are required to complete annual Safeguarding privacy and confidential information, and Customary Propriety Network Information (CPNI) training.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	All CDC personnel are required to take Privacy and Security Awareness Training at least annually.

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).

Records are retained and disposed of in accordance with the CDC Records Control Schedule Scientific and Research Project Records (N1-442-09-001). Record copy of reports maintained in the agency from two to three years in accordance with retention schedules. Source documents for computer are disposed of when no longer needed by program officials. Personal identifiers may be deleted from records when no longer or as determined by the system manager, and as provided in the signed consent form, as appropriate. Disposal methods include erasing computer tapes, burning or shredding paper materials or transferring records to the Federal Records Center when no longer needed for evaluation and analysis. Records are retained for 20 years. The data routes from an on-line form to the CDC-INFO National Call Center.

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 controls include a system security plan, contingency plan, regular back up of files and storage of privilege access enforced through userid and password, separate user and privileged accounts for administrators, policies and procedures in place for retention and destruction of PII, and a corporate incident response team and incident response plans.

Technical controls include identification and authentication using unique user IDs, passwords, encryption mechanisms are used to protect against any anticipated threats or hazards, and use of firewalls and intrusion detection/prevention systems, virus scanning software on all computers, and a Security Information and Event Management (SIEM/ solution.

Physical controls include guards, identification badges, key cards, and closed circuit TV.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	4/11/2024
Privacy Analyst Comments:	OpDiv Analyst: Joshua Mosios (Contractor)	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:	26

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	5/28/2024
Agency Privacy Analyst Review Comments:	Reviewer Jim Laskowski 5/28/2024 Per attached PIA (see supporting Documentation) confirm that PTA-7A response is "No." This PIA is ready for SAOP review and approval.	Agency Privacy Analyst Days Open:	22

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:	The SOAP review days open is incorrect, please watch this PIA for stripped approvals. Per attached PIA (see supporting Documentation) confirm that PTA-7A response is "No." This PIA is ready for SAOP review and approval.	SAOP Review Date:	6/14/2024
		SAOP Days Open:	17

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
Copy_of_INFO-WFV Privacy_Impact_Assessment_PIA_bl (7).rtf	210829	.rtf	5/28/2024 10:17 AM	0

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 19	Data Feed Service, piafrmcdc	4/9/2024	An administrative procedure is still required to protect the PII the system processes.	
PIA - 20	Data Feed Service, piafrmcdc	4/9/2024	A technical procedure is still required to protect the PII the system processes.	
PIA - 23	Data Feed Service, piafrmcdc	4/9/2024	The system should still have a records control schedule for processing the PII.	
PIA - 24	Data Feed Service, piafrmcdc	4/9/2024	The administrative procedure listed is technical. The technical procedure listed contains sensitive information and should be generalized. The physical procedure contains an outdated acronym (ITSO).	
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:	View History Log
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