

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 - IRR - QTR2 - 2023 - CDC6736120	PIA ID:	1672414
Name of Component:	CDC - CDC International Reagent Resource	Name of ATO Boundary:	CDC International Reagent Resource
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	394
Submission Status:	Re-Submitted	Submit Date:	4/2/2024
Next Assessment Date:	N/A	Expiration Date:	5/23/2027
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC6736120
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.		5/3/2024
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.	Since the last PIA, user contact information has been identified as PII and has been added to include Email Address, Phone Number, Name, Mailing Address, Username, and Password.
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 CDC International Reagent Resource (IRR) is a web portal will provide for electronic catalog searches, storefront for e-commerce functions, registration for qualified organizations, and electronic information source for the IRR program. The IRR web portal information system will provide a secure, interface for authorized organizations to access the CDC's International Reagent Resource Program.

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.	IRR connects using contact information user credentials consisting of User ID, Email Address, Name, Organization Address and Telephone Number, Passwords and -Resource Code (organizational login code) are to store for account authorization and login. The database systems will track all information related to the activity of the CDC-IRR including maintaining the inventory of agents, reagents, and kits, recording Quality Control (QC) tests and results, curating mailing lists and records of registered users and managing shipping and receiving information. Reporting functions can provide reports in spreadsheet formats, delimited text, database formats or hard copy.
PTA - 5A:	Are user credentials used to access the system?	
PTA - 5B:	Please identify the type of user credentials used to access the system.	<p>HHS User Credentials</p> <ul style="list-style-type: none"> HHS Username Password <p>Non-HHS User Credentials</p> <ul style="list-style-type: none"> Username Password
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.	IRR connects using contact information user credentials consisting of User ID, Email Address, Name, Organization Address and Telephone Number, Passwords and -Resource Code (organizational login code) are to store for account authorization and login. Five CDC users authenticate via Active directory while third party internal privileged users authenticate with username/password are being kept within this tool. The database systems will track all information related to the activity of the CDC-IRR including maintaining the inventory of agents, reagents, and kits, recording Quality Control (QC) tests and results, curating mailing lists and records of registered users and managing shipping and receiving information. Reporting functions can provide reports in spreadsheet formats, delimited text, database formats or hard copy. IRR is needed to provide a secure external system that support document transfer without service interruption, improve access to materials for qualified public health professionals, clinicians, researchers, and developers of influenza vaccines, antiviral drugs, and influenza virus diagnostic products. IRR operates a secure searchable electronic online catalog, ordering portal that facilitate online registration needed for influenza viruses, bacterial pathogens reagents in human influenza.
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?	
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.	<p>The International Reagent Resource (IRR) is a public-facing dynamic and adaptable electronic reagent catalog and distribution program that provides reagents, test kits, and information for the detection of influenza and other emerging viral and bacterial pathogens at no cost to registered domestic and international public health labs.</p> <p>Limited access and information are made available on the public facing website to non-registrants. Registration is open to private, commercial, and non-profit laboratories, including state and regional public health laboratories, universities, and international ministries of health. The website is viewable or accessible to public non-registrants, registrants, and internal administrators. The website URL is https://www.internationalreagentresource.org.</p> <p>Public non-registrants can view the website but are not able login for additional access.</p> <p>Registrants can view the website and login by entering login credentials for additional access based on level of access permissions approved at time of registration.</p> <p>CDC admin login with user credentials provided and are validated in real time; validated against a Limited Role based access control.</p> <p>Internal IRR Administrators can view the website and login for additional access (limited to access for specified internal admin role, website write privileges are restricted/removed; website read privileges only provided) if outside the network.</p>
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?	Yes
PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	Yes
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 Mailing Address User Credentials
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
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?	Contact information is collected for registration for site access used for reagent ordering and training for system administrators.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	To communicate with users on issues and events.
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	SSN and Taxpayer ID not collected.
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, Section 301, "Research and Investigation," (42 U.S.C. 241); and Sections 304, 306 and 308(d) which discuss authority to maintain data and provide assurances of confidentiality for health research and related activities (42 U.S.C. 242 b, k, and m(d)).
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 Hard Copy Mail/Fax Email
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.	An OMB number is not required as the collection of contact information is for business PII used to assist project officers with federal funding. The respondents are employees acting within the scope of their employment for which the information is collected.
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.	An individual may submit an opt out or registration deactivation request by contacting IRR via the online Contact Us page, or email request to contact@internationalreagentresource.org . Contact Information is required for full registrant access unless user declines access to the entire project when hired. Registrants can request deactivation at any time.
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.	Email addresses are determinable so that users can be notified via email when major changes occur to the system.

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.	IRR users may contact the CDC International Reagent Resource administrators Monday-Friday 8:30am-4:30pm toll free at 1866-951-2822, TTY: 703-365-2727 or email IRR's Inquiry Portal if they believe their credentials have been inappropriately obtained, used, or disclosed, or that the credentials are inaccurate. Concerns will be reviewed, and as applicable, investigated, and resolved by IRR administrators.
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 Business Steward, or delegated system administrator review access reports on a monthly basis. They also review user credentials and audit access accounts annually.
PIA - 17:	Identify who will have access to the PII in the system.	Administrators Developers Contractors
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.	Administrator/s will have access to the PII (user credentials) in order to administer permissions. Developers will not routinely have access to the PII but access in rare circumstances to conduct e database/troubleshoot errors. Randomly generated development data will not trigger the same issues as production data. Direct Contractors will have access for data entry and analysis, process test kits, and create reports.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	All IRR users' administrators, developers including direct contractors must be approved by the Business Steward based on their role and duty prior to gaining access to PII data utilizing the Role Based Access Control (RBAC). The roles are predefined, and users are assigned roles as appropriate to according to responsibilities.
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.	The Program Business Steward must identify the user as having a need to know the information on the system. The methods in place to allow those with access to PII to only access the minimal amount of information necessary to perform their job duties are based on Least Privilege security controls. Role Based Access system controls which allow those with authorized access to the PII to only access the minimum amount of information necessary to perform their job.

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.	CDC staff complete annual IT security and privacy awareness training.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	Users also receive specific system training to understand system operation to include CDC Role-Based Training Annually, and CDC Records Management Training 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).	User accounts and associated PII are removed when no longer needed for access. The PII and user accounts are temporary administrative records and not subject to long term records retention. CDC Records Control Schedule 01-01-01d Office Administrative Files. User accounts are reviewed annually.
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: Administrative controls include a security plan, contingency plan, file back-up, least privilege, and training. Access reports are reviewed on a monthly basis. Access to the application is approved by the program business steward indicating that the user has a need to know the information on the system.</p> <p>Technical: PII data is encrypted and stored in a secure database. Technical controls are in place to manage user identity, identity proofing, authentication, and authorization.</p> <p>Physical: Physical controls include Identification Badges, Key Cards, and Closed-Circuit TV (CCTV). The system is housed on CDC property in a protected data center by guards, gates, and surveillance at the entry point to the facility. Individual user access credentials are required for each non-public building, floor, and office. Access to the data center is limited to authorized personnel.</p>

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	4/3/2024
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:	4/29/2024
		SOP Days Open:	27

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	4/30/2024
Agency Privacy Analyst Review Comments:	<p>Reviewer: Jim Laskowski</p> <p>4/30/2024 PTA-5A, PTA-7A, and PTA-8 display "error" but we have confirm with CDC that the response is "Yes" to all question see attached PIA. CDC also address all comments. This PIA is ready for SAOP review and approval.</p> <p>3/19/2024 Per CDC's email rejected the PIA.</p> <p>3/15/2024 SAOP-upon review has some concerns and email CDC Privacy for clarification.</p> <p>3/14/2024 All comments seemed to have been addressed. This PIA is ready for SAOP review and approval.</p> <p>7/14/2023 Reviewer: Giselle Sayon</p> <p>This PIA is ready for SAOP review and approval.</p>	Agency Privacy Analyst Days Open:	1

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:	PTA-5A, PTA-7A, and PTA-8 display "error" but we have confirm with CDC that the response is "Yes" to all question see attached PIA. CDC also address all comments.	SAOP Review Date:	5/23/2024
		SAOP Days Open:	23

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
IRR Privacy_Impact_Assessment_PIA_bl_jl_PA_Approved.rtf	949892	.rtf	3/7/2024 1:51 PM	2
Re_CDC PIA(s)_CDC6787120 and CDC6736120.pdf	272514	.pdf	3/19/2024 2:48 PM	0

Comments

Question Name	Submitter	Date	Comment	Attachment						
PIA - 5	Data Feed Service, piafrmcdc	6/20/2023	PIA 14 indicates that email will be used to contact individuals if a major chance to this system occurs. Please indicate that email will be use for contacting individuals.							
PIA - 7	Data Feed Service, piafrmcdc	6/20/2023	Due to you selecting Yes in PTA-7, you are required to provide an legal authority this is applicable to why this system has PII.							
PIA - 15	Data Feed Service, piafrmcdc	6/20/2023	Please provide the contact information and refrain from using an individual`s PII, and only provide group email and/or phone numbers.							
PIA - 19	Data Feed Service, piafrmcdc	6/20/2023	Please include the the administrative procedures.							
PIA - 5	Data Feed Service, piafrmcdc	6/28/2023	<p>Non-Responsive. Please see the below response from PIA 14 and adjust this answer accordingly:</p> <p>Email addresses are determinable so that users can be notified via email when major changes occur to the system.</p>							
PIA - 13	KORAN, ELIZABETH	7/28/2023	The system collects PII beyond user credentials. How are individuals notified that their contact information will be collected by the system?							
PIA - 17	KORAN, ELIZABETH	7/28/2023	Do users have access to PII? For example, in order to process orders?							
PIA - 2	KORAN, ELIZABETH	7/28/2023	Please add HHS employees/Direct Contractors as their user credentials are collected.							
PIA - 1	KORAN, ELIZABETH	7/28/2023	<table border="1"> <tr> <td>PTA-2a</td> <td>The response to PTA-2a is not res</td> </tr> <tr> <td>PTA-5a</td> <td>The response to PTA-5a did not directory, we want to ensure that</td> </tr> <tr> <td>PTA-8</td> <td>The response is no, however the</td> </tr> </table>	PTA-2a	The response to PTA-2a is not res	PTA-5a	The response to PTA-5a did not directory, we want to ensure that	PTA-8	The response is no, however the	
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PTA-5a	The response to PTA-5a did not directory, we want to ensure that									
PTA-8	The response is no, however the									
PIA - 14	Data Feed Service, piafrmcdc	8/9/2023	Please expound on how emails are determinable.							

Admin Section

Is OpDiv Privacy Analyst Approved?: 1

Is Agency Privacy Analyst Approve?: 1

Is SAOP Approved?: 1

Total Approved: 4

Total Approval Required: 4

Is OpDiv Privacy Analyst Return?: 0

Is SOP Return?: 0

Is Agency Privacy Analyst Return?: 0

Is SAOP Return?: 0

Total Return: 0

Miscellaneous Fields

Last Updated: 5/23/2024 4:01 PM

History Log: [View History Log](#)