

## General Information

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| <b>PTA / PIA Name:</b>                | CDC - KWFH - QTR2 - 2026 - CDC8897102                                                         | <b>PTA / PIA ID:</b>      | 4552214                |
| <b>Component Name:</b>                | CDC - Kiteworks Fedramp High                                                                  | <b>ATO Boundary Name:</b> | Kiteworks Fedramp High |
| <b>Overall Status:</b>                | Complete<br> | <b># of Days - Open:</b>  | 44                     |
| <b>Submitter:</b>                     |                                                                                               | <b>Submit Date:</b>       | 6/3/2026               |
| <b>Next Assessment Date:</b>          | 06/17/2029                                                                                    | <b>Expiration Date:</b>   | 6/17/2029              |
| <b>Office:</b>                        |                                                                                               | <b>OpDiv:</b>             | CDC                    |
| <b>Security Categorization:</b>       | High                                                                                          |                           |                        |
| <b>Make PIA available to Public?:</b> | No                                                                                            | <b>PIA Required:</b>      | Yes                    |
| <b>General 01:</b>                    | Identify the Enterprise Performance Lifecycle Phase of the system.                            |                           | Initiation             |
| <b>General 02:</b>                    | Is this a FISMA-Reportable system?                                                            |                           | Yes                    |
| <b>General 03:</b>                    | Does the system have or is it covered by a Security Authorization to Operate (ATO)?           |                           | No                     |
| <b>General 04:</b>                    | ATO Date or Planned ATO Date.                                                                 |                           |                        |
| <b>General 05:</b>                    | Is the system or electronic information collection, agency or contractor operated?            |                           | Contractor             |
| <b>History Log:</b>                   | <a href="#">View History Log</a>                                                              |                           |                        |

## Privacy Threshold Analysis

## Privacy Threshold Analysis

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| <b>PTA 01:</b>  | Point of Contact (POC) Name                                                       | Lee Eilers              |
| <b>PTA 01A:</b> | POC Title and Organization                                                        | Team Lead OCOO/OCIO/DSO |
| <b>PTA 01B:</b> | POC Email Address                                                                 | LEE4@cdc.gov            |
| <b>PTA 01C:</b> | POC Phone Number                                                                  | 770.488.2428            |
| <b>PTA 02:</b>  | Indicate the following reason(s) for this PTA. Choose from the following options. | New                     |
| <b>PTA 03:</b>  | Is the data contained in the system owned by the agency or contractor?            | Contractor              |

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| <p><b>PTA 04:</b></p>  | <p>Please give a brief overview of the purpose of the system by describing what the functions of the system are and how the system carries out those functions in support of HHS.</p>                       | <p>Kiteworks FedRamp High (KWFH) is a Secure File Transfer Platform which is a FedRAMP High-authorized Software-as-a-Service solution that enables secure file sharing, collaboration, and managed file transfer for CDC users and external partners.</p> <p>The system, owned and operated by KiteWorks USA, Limited Liability Corporation (LLC), is used by CDC programs to securely exchange sensitive data with internal and external stakeholders.</p> <p>The platform supports secured file upload, download, sharing, and messaging workflows through a web portal, desktop client, or mobile access.</p>                                                                                                                                                                                                                                                                                                                                           |
| <p><b>PTA 05:</b></p>  | <p>List and/or describe all the types of information that are collected, maintained, and/or shared by the system regardless of whether that information is PII and how long that information is stored.</p> | <p>KWFH is not designed to collect or store information from the documents that are being transferred; instead, it facilitates electronic document or file exchanges and transfers among CDC personnel and their known collaborators. The system does collect the following Information from users: name, username and/or email address, file metadata/content (file name, file description, file location, file size, file hash, file create date).</p> <p>KWFH enables secure file share access using the Active Directory (AD) infrastructure. This system facilitates electronic document or file exchanges and transfers among CDC personnel and their known collaborators.</p> <p>KWFH is not designed to collect or store information from the documents that are being transferred. The system does collect the following Information from CDC users which is used to initiate the secure transfer request: name, username, and email address.</p> |
| <p><b>PTA 05A:</b></p> | <p>Are user credentials used to access the system?</p>                                                                                                                                                      | <p>Yes, but the user credentials are maintained in a separate system (e.g., AD, AMS) and not collected or maintained by this system.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p><b>PTA 05C:</b></p> | <p>Please identify the system that maintains the user credentials or controls access to this system.</p>                                                                                                    | <p>The system providing credentials for this application is: CDC Active Directory (CDC AD). CDC AD is a separate system with its own PIA.</p> <p>Additionally, External users authenticate via KiteWorks-managed identities with Multi-Factor Authentication (MFA).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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| <b>PTA 06:</b>  | Describe why each type of information is collected, maintained, and/or shared by the system. Specify what information is collected about each category of individual.      | <p>KWFH is not designed to collect or store information from the documents that are being transferred; instead, it facilitates electronic document or file exchanges and transfers among CDC personnel and their known collaborators. The system does collect the following Information from users: name, username and/or email address, file metadata/content (file name, file description, file location, file size, file hash, file create date).</p> <p>KWFH enables secure file share access using the AD infrastructure. This system facilitates electronic document or file exchanges and transfers among CDC personnel and their known collaborators.</p> <p>KWFH is not designed to collect or store information from the documents that are being transferred. The system does collect the following Information from CDC users which is used to initiate the secure transfer request: name, user name, and email address.</p> |
| <b>PTA 07:</b>  | Does the system collect, maintain, use, or share PII?                                                                                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>PTA 08:</b>  | Does the system include a website or online application?                                                                                                                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>PTA 08A:</b> | Provide the URL(s).                                                                                                                                                        | <a href="https://SecureShare.cdc.gov">https://SecureShare.cdc.gov</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>PTA 08B:</b> | Are any of the website or online applications accessible by the public (including publicly accessible log in pages)?                                                       | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>PTA 09:</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. | This is an external file sharing systems used by CDC staff and contractors, as well as CDC health partners. The website is accessed via a url: <a href="https://SecureShare.cdc.gov">https://SecureShare.cdc.gov</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>PTA 10:</b>  | Does the website have a posted privacy notice?                                                                                                                             | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>PTA 11:</b>  | Does the website contain links to non-federal government websites external to HHS?                                                                                         | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>PTA 12:</b>  | Does the website use web measurement and customization technology?                                                                                                         | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>PTA 13:</b>  | Does the website have any information or pages directed at children under the age of thirteen?                                                                             | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>PTA 14:</b>  | Does the system have a mobile application?                                                                                                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>PTA 14A:</b> | Is the mobile application HHS developed and managed or a third-party application?                                                                                          | Third-party                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <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.                               | <p>The purpose of the mobile application is to facilitate the sending and receiving of files between CDC staff, contractors and CDC health partners.</p> <p>Users access the mobile app on Apple/Android devices, after downloading, Two Factor Authentication (2FA).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>PTA 16:</b>  | Does the mobile application have a privacy notice?                                                                                                                         | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>PTA 17:</b>  | Does the mobile application contain links to non-federal government websites external to HHS?                                                                              | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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| <b>PTA 17A:</b> | Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS? | No |
| <b>PTA 18:</b>  | Does the mobile application use measurement and customization technology?                                      | No |
| <b>PTA 19:</b>  | Does the mobile application have any information directed at children under the age of thirteen?               | No |
| <b>PTA 20:</b>  | Are any third-party websites or applications (TPWA) associated with the system?                                | No |
| <b>PTA 21:</b>  | Does this system use artificial intelligence (AI) tools or technologies?                                       | No |

## Privacy Impact Assessment

### Privacy Impact Assessment

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| <b>PIA 22:</b> | Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share. | Biographical Information<br>Name<br>User Credentials<br>Contact Information<br>Email Address (Business)                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>PIA 23:</b> | Indicate the categories of individuals about whom PII is collected, maintained, or shared.                          | Business Partners/Contacts (Federal state, local agencies)<br>Employees/HHS Direct Contractors                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>PIA 24:</b> | Indicate the approximate number of individuals whose PII is maintained in the system.                               | 500 – 4,999                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>PIA 25:</b> | For what primary purpose is the PII used?                                                                           | The primary purpose of the Personally Identifiable Information (PII) used by the KiteWorks FedRamp High (KWFH) is to authenticate and identify system users. PII enables secure access control, ensures that only authorized individuals can access the system, and supports accountability through audit logging. All PII is used strictly to support the operational, security, and collaboration functions of the platform in accordance with CDC policies and federal privacy requirements. |
| <b>PIA 26:</b> | Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).                  | There are no secondary uses of Personally Identifiable Information (PII) collected by the KiteWorks FedRamp High (KWFH). PII is used solely for operational purposes such as authentication, and access control. It is not used for testing, training, research, or any other non-operational activities. All use of PII is limited to what is necessary to support secure and effective collaboration through the platform, in accordance with CDC privacy and security policies.              |

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| PIA 28:  | Identify legal authorities, governing information use and disclosure specific to the system and program. | <p>The KiteWorks FedRamp High (KWFH) operates under the legal authority of Title 42, § 242c and related sections, which provides the statutory basis for the Centers for Disease Control and Prevention (CDC) to collect, use, and disclose information in support of its public health mission. These statutes authorize CDC to conduct public health surveillance, investigations, and interventions, and to collect and manage data necessary to carry out these functions. The use of KWFH aligns with these authorities by enabling secure communication and coordination among CDC staff and external partners.</p> <p>Additionally, the system complies with the following federal laws and policies: the Federal Information Security Modernization Act (FISMA), which mandates the protection of federal information systems; the Electronic Communications Privacy Act (ECPA), which protects electronic communications in transit and storage; and FedRAMP Authorization, ensuring that the platform meets federal security and privacy standards for cloud services.</p> <p>5 U.S.C. § 301 also applies, as it authorizes the head of an executive department to prescribe regulations for the governance of the department, including the custody, use, and preservation of its records, papers, and property. This statute supports the CDC's ability to establish internal policies for managing information systems and data.</p> <p>The system also adheres to CDC's internal privacy and data protection policies, including the use of warning banners, role-based access controls, and annual privacy and security training for all users.</p> |
| PIA 29:  | Are records in the system retrieved by one or more PII data elements?                                    | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| PIA 30:  | Identify the sources of PII in the system.                                                               | <p>Directly from an individual about whom the information pertains</p> <ul style="list-style-type: none"> <li>Email</li> <li>Online</li> </ul> <p>Government Sources</p> <ul style="list-style-type: none"> <li>Within the OPDIV</li> <li>Other HHS OPDIV</li> </ul> <p>Non-Government Sources</p> <ul style="list-style-type: none"> <li>Other</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| PIA 30A: | Identify the "other" sources of PII in the system not mentioned in the above list.                       | External Partners                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| PIA 31:  | Is there an Office of Management and Budget (OMB) information collection approval number?                | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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| <b>PIA 31B:</b> | Explain why an OMB information collection approval number is not required.                                                                                                      | <p>The KiteWorks FedRamp High (KWFH) does not currently require an OMB information collection approval number because it does not independently collect information from the public in a manner that meets the threshold defined by the Paperwork Reduction Act (PRA). Specifically, the system does not initiate structured data collection from ten or more members of the public or external non-CDC staff that would require OMB review and approval.</p> <p>If a third-party contractor is providing information about themselves (e.g., for identity verification, access credentials, or onboarding) and this information is collected by or on behalf of the CDC, the PRA does not apply when the contractor is acting as a federal employee or agent performing official duties.</p> <p>If future use of the KWFH includes structured information collection from the public, such as surveys or registration forms involving ten or more non-federal individuals, a PRA submission and OMB control number would be required in accordance with 44 U.S.C. § 3501 et seq. and 5 CFR 1320.</p> |
| <b>PIA 32:</b>  | Is the PII in the system shared directly with other organizations outside the system's Operating Division?                                                                      | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>PIA 33:</b>  | Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?                                                                                   | Voluntary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>PIA 34:</b>  | Describe the method in place to notify and obtain consent from individuals whose PII will be collected. If no prior notice is given or consent cannot be obtained, explain why. | <p>There is no general opt-out mechanism for individuals who wish to use the KiteWorks FedRamp High (KWFH), as the collection of certain personally identifiable information (PII) is required to enable secure access, and authentication. Information such as name, and email address is necessary to establish user identity, manage access, and ensure system security and accountability.</p> <p>Individuals who do not wish to provide this information may choose not to use the platform; however, this may limit their ability to interact with the CDC. The collection and use of PII are governed by CDC's privacy policies and are limited to the minimum necessary to fulfill operational and security requirements.</p>                                                                                                                                                                                                                                                                                                                                                                 |

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| <p><b>PIA 35:</b></p> | <p>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). If they cannot be notified or have their consent obtained, explain why.</p> | <p>When major changes occur to the KiteWorks FedRamp High (KWFFH) that affect the collection, use, or disclosure of personally identifiable information (PII), CDC notifies affected individuals. Notification may occur through system-wide announcements, updated privacy notices, internal CDC communications, or direct email notifications, depending on the nature and scope of the change.</p> <p>If the change involves a new use or disclosure of PII not previously covered by an existing notice or agreement, CDC may seek updated consent from users or provide an opportunity to opt out, where feasible. CDC ensures that updated privacy policies are made publicly available and accessible through official channels.</p> <p>All changes are reviewed by CDC's privacy and legal teams to ensure compliance with applicable laws, regulations, and internal policies.</p>                                                                                                                                                                                                                                                                                                                                                                                  |
| <p><b>PIA 36:</b></p> | <p>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.</p>                                                                                             | <p>Individuals who believe their personally identifiable information (PII) has been inappropriately obtained, used, disclosed, or is inaccurate may raise their concerns through established CDC procedures. Concerns can be submitted to the CDC Privacy Office or the system owner via email or formal complaint channels. Additionally, individuals may contact the CDC Networking and Operations Security Center (NOSC) at 866-655-2245 to report suspected misuse or unauthorized disclosure of PII.</p> <p>Upon receipt, the concern is reviewed by appropriate privacy, security, and legal personnel to determine the nature and scope of the issue. If the concern involves a potential breach or unauthorized disclosure, it is escalated in accordance with CDC's incident response procedures. Investigations are conducted to assess the impact, identify root causes, and implement corrective actions. If the concern relates to inaccurate PII, individuals may request correction through the appropriate administrative process, and updates are made if verified.</p> <p>All concerns are handled in accordance with CDC's privacy policies, the Privacy Act of 1974, and applicable federal regulations to ensure timely and appropriate resolution.</p> |

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| <b>PIA 37:</b> | Describe the process in place for periodic reviews of the system to ensure the integrity, availability, accuracy, and relevancy of the PII in the system. Please address each element in your response. If no processes are in place, explain why not. | <p>The KiteWorks FedRamp High (KWFH) is subject to periodic reviews and continuous monitoring to ensure the integrity, availability, accuracy, and relevancy of personally identifiable information (PII) stored and processed within the system.</p> <p>Integrity is maintained through access controls, encryption, and audit logging, which help prevent unauthorized modification of PII. System logs are reviewed regularly to detect anomalies or unauthorized activity, and corrective actions are taken as needed.</p> <p>Availability is ensured through the use of a FedRAMP-authorized cloud infrastructure with built-in redundancy, failover capabilities, and disaster recovery procedures. These measures help maintain continuous access to the system and its data, even during maintenance or unexpected outages.</p> <p>Accuracy is supported by user-managed profiles and administrative oversight. Users are responsible for maintaining up-to-date information in their accounts, and administrators can update or correct data when necessary. Periodic reviews of user accounts and meeting metadata are conducted to identify and resolve discrepancies.</p> <p>Relevancy is addressed by limiting data collection to the minimum necessary for system functionality and by applying data retention policies that govern how long PII is stored. Data that is no longer needed for operational, legal, or compliance purposes are deleted or archived in accordance with CDC's records management policies.</p> |
| <b>PIA 38:</b> | Identify who will have access to the PII in the system.                                                                                                                                                                                                | <p>Users</p> <p>Administrators</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>PIA 39:</b> | Provide the reason why each of the groups identified in 38 needs access to PII.                                                                                                                                                                        | <p>Users require access to their own personally identifiable information (PII) to authenticate into the KiteWorks FedRamp High (KWFH), manage their profiles. This access enables secure communication and collaboration within the system.</p> <p>Administrators require access to PII to manage user accounts, configure system settings, monitor platform activity, and ensure compliance with security and privacy policies. Their access supports operational integrity, incident response, and audit functions.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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| <p><b>PIA 40:</b></p> | <p>Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>            | <p>Access to personally identifiable information (PII) within the KiteWorks FedRamp High (KWFH) is governed by CDC's role-based access control policies and procedures. Access is granted based on the principle of least privilege and is limited to individuals whose official duties require it.</p> <p>Administrators are designated by system owners or authorized CDC personnel and are granted access to PII only to the extent necessary to manage user accounts, configure system settings, and monitor platform activity. Their access is reviewed periodically to ensure continued need and compliance.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>PIA 41:</b></p> | <p>Describe the technical methods in place to allow those with access to PII to access only the minimum amount of information necessary to perform their job.</p> | <p>The KiteWorks FedRamp High (KWFH) system, employs a combination of role-based access controls, least privilege principles, and system configuration settings to ensure that users only access the minimum amount of personally identifiable information (PII) necessary to perform their job functions.</p> <p>Access to PII is governed by predefined user roles such as user and administrator. Each role has specific permissions that limit access to data types and system functions. For example, users can only view their own account information and shared content. Administrators have access to system-level logs and configurations but are restricted from accessing content unless explicitly authorized.</p> <p>User accounts are provisioned with the minimum permissions required for their role. Elevated privileges are granted only to authorized personnel with a documented business need and are reviewed periodically.</p> <p>All access to PII and administrative actions are logged and monitored. Logs are reviewed regularly to detect unauthorized access or privilege misuse.</p> |

**PIA 42:**

Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) to make them aware of their responsibilities for protecting the information being collected and maintained.

All users of the KiteWorks FedRamp High (KWFH), are required to complete annual security and privacy awareness training as mandated by the Centers for Disease Control and Prevention (CDC) and the Department of Health and Human Services (HHS). This training covers the responsibilities of personnel in protecting personally identifiable information (PII) and other sensitive data.

The training includes topics such as identifying and handling PII, recognizing phishing and social engineering threats, understanding access control principles, reporting security incidents, and following CDC's acceptable use policies. Specialized annual training is also provided to system administrators and privileged users to ensure they understand their elevated responsibilities and the technical safeguards in place.

Completion of training is tracked through CDC's Learning Management System (LMS), and compliance is monitored by the Office of the Chief Information Security Officer (OCISO). Users must complete this training prior to being granted access to the system and must renew it annually to maintain access.

**PIA 43:**

Describe the training system users receive above and beyond general security and privacy awareness training.

In addition to the required annual security and privacy awareness training, users of the KiteWorks FedRamp High (KWFH) who have elevated responsibilities such as system administrators, receive additional annual role-based training specific to their duties. This training includes instruction on secure system configuration, managing user access, handling meeting content responsibly, and applying CDC policies related to data protection and external collaboration.

System administrators receive annual technical training on managing the system environment, including monitoring system activity, configuring security settings, and responding to incidents. This training is delivered through a combination of online modules, job aids, and instructor-led sessions, and is updated as needed to reflect changes in system capabilities or policy requirements.

**PIA 44:**

Describe the process and guidelines in place for the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).

The KiteWorks FedRamp High (KWFH) system retains and disposes of personally identifiable information (PII) in accordance with the Federal Records Act, CDC policies, and applicable National Archives and Records Administration (NARA) records retention schedules. PII collected and maintained by the system includes user account information and shared files.

CDC retains PII only for as long as it is necessary to fulfill the purpose for which it was collected. Information is maintained and destroyed in accordance with approved records schedules, including the General Records Schedules (GRS) issued by NARA. For example, transitory and intermediary records such as temporary chat messages or meeting invitations may fall under GRS 5.2, which allows for immediate deletion or deletion when no longer needed for business use. More substantive records, such as meeting recordings or shared documents that support agency operations, may be covered under GRS 6.1 for electronic messages or GRS 6.3 for information technology records, depending on their content and use.

NARA Bulletin 2023-04 provides specific guidance for managing records created on collaboration platforms. It emphasizes that agencies must evaluate the content of each record to determine the appropriate retention schedule. Not all records created in collaboration platforms are subject to the same retention period. Agencies must apply either an existing GRS or an agency-specific schedule based on the record's function and value.

Destruction of PII is carried out in a secure manner consistent with CDC's internal policies and NARA requirements. Temporary records are deleted at the end of their retention period using methods that prevent unauthorized access or reconstruction. Permanent records, if any, are transferred to NARA with appropriate metadata.

**PIA 45:**

Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.

The KiteWorks FedRamp High (KWFH) system, secures personally identifiable information (PII) through a layered approach that includes administrative, technical, and physical controls in accordance with CDC and federal information security policies.

Administrative controls include the enforcement of CDC's security and privacy policies, mandatory annual training for all users, and role-based access control to ensure that only authorized personnel can access PII. Access to the system is granted based on the principle of least privilege and is reviewed periodically. System administrators and privileged users receive additional training specific to their responsibilities. CDC also maintains incident response procedures and conducts regular audits and assessments to ensure compliance with applicable laws and regulations.

Technical controls include the use of encryption for data in transit and at rest, multi-factor authentication for user access, and secure configuration baselines aligned with the Federal Risk and Authorization Management Program (FedRAMP). The platform logs all access and administrative actions, and these logs are monitored for suspicious activity. The system is hosted in a FedRAMP-authorized cloud environment that meets federal security standards.

Physical controls are implemented by the cloud service provider hosting the KiteWorks FedRamp High environment. These include secure data centers with access restrictions, surveillance, and environmental safeguards. Physical access to CDC facilities where administrative functions are performed is also restricted to authorized personnel and protected by badge access systems, security personnel, and visitor management procedures.

Together, these controls ensure that any potential PII collected and processed by the KWFH is protected against unauthorized access, disclosure, alteration, and destruction.

| Review and Comments              |                                                                                            |                              |          |
|----------------------------------|--------------------------------------------------------------------------------------------|------------------------------|----------|
| OpDiv Privacy Analyst Review     |                                                                                            |                              |          |
| Privacy Analyst Review Decision: | Approved                                                                                   | Privacy Analyst Review Date: | 6/3/2026 |
| Privacy Analyst Review Comments: | Please review the comments dated 5/13/2026.<br>Please contact me if you have any questions | # of Days - PA Review:       | 0        |

| SOP Review           |                                      |                         |          |
|----------------------|--------------------------------------|-------------------------|----------|
| SOP Review Decision: | Approved                             | SOP Review Date:        | 6/9/2026 |
| SOP Review Comments: | Approved on behalf of Beverly Walker | # of Days - SOP Review: | 6        |

| Agency Privacy Analyst Review           |                                                                                           |                                     |           |
|-----------------------------------------|-------------------------------------------------------------------------------------------|-------------------------------------|-----------|
| Agency Privacy Analyst Review Decision: | Approved                                                                                  | Agency Privacy Analyst Review Date: | 6/12/2026 |
| Agency Privacy Analyst Review Comments: | Reviewer: Philomina Dorkenoo<br>6/12/2026 This PIA is ready for SAOP review and approval. | # of Days - APA Review:             | 3         |

| SAOP Review           |               |           |                          |                |                |
|-----------------------|---------------|-----------|--------------------------|----------------|----------------|
| SAOP Review Decision: |               | Approved  | SAOP Review Date:        |                | 6/18/2026      |
| SAOP Review Comments: |               |           | # of Days - SAOP Review: |                | 6              |
| SAOP Signature        |               |           |                          |                |                |
| Date                  | User          | Type      | Name                     | Original Value | New Value      |
| 6/18/2026 1:38 PM     | BAUR, VANESSA | Signature | SAOP (Email PIN)         |                | Content Signed |

| Supporting Document(s) |      |      |             |           |
|------------------------|------|------|-------------|-----------|
| Name                   | Size | Type | Upload Date | Downloads |
| No Records Found       |      |      |             |           |

| Comments      |                                        |           |                                                                                                                           |            |
|---------------|----------------------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------|------------|
| Question Name | Submitter                              | Date      | Comment                                                                                                                   | Attachment |
| PTA 04        | Data Feed Service, pta_pia_CDC_Release | 5/11/2026 | First use "FedRamp, USA, LLC, sync ", please spell out, if applicable                                                     |            |
| PTA 05        | Data Feed Service, pta_pia_CDC_Release | 5/11/2026 | 1.Please confirm the sentence, as it does not state whether the electronic documents/file exchange/transfers are secured. |            |

Suggestive language. "This system facilitates **secured** electronic documents or file exchanges and transfers among CDC personnel and their known collaborators."

2. The BSI does not show an Enterprise System Catalog (ESC) ID in Table 1.2; the system must be registered with the ESC. Please update the BSI with the ESC ID.

3. In accordance with the BSI Section 3, "Data processed by the system includes **user account information, file metadata, and file content, which may include sensitive but unclassified (SBU) data.**" Please confirm and update these information/data types in this response and describe in PTA-6.

|         |                                           |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------|-------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PTA 06  | Data Feed Service,<br>pta_pia_CDC_Release | 5/11/2026 | <p>1. Please confirm the sentence, as it does not state whether the electronic documents/file exchange/transfers are secured. Suggestive language. "This system facilitates secured electronic documents or file exchanges and transfers among CDC personnel and their known collaborators."</p> <p>2. Please define or provide an example of what type of electronic documents, file exchanges and transfers. "This system facilitates electronic document or file exchanges and transfers ...".</p> |
| PTA 08A | Data Feed Service,<br>pta_pia_CDC_Release | 5/11/2026 | <p>Please confirm the use of "name", as the URL goes to a site that ask for "username" or email address. The email address is identified in PTA-5 and PTA-6; however, the username is not identified in the 2 responses. Please update as needed.</p>                                                                                                                                                                                                                                                 |
| PTA 15  | Data Feed Service,<br>pta_pia_CDC_Release | 5/11/2026 | <p>1. Please reread the first sentence. The word "send" maybe written as "sending"</p> <p>2. First use " iOS, 2FA", please spell out.</p>                                                                                                                                                                                                                                                                                                                                                             |
| PTA 05C | Data Feed Service,<br>pta_pia_CDC_Release | 5/11/2026 | <p>In accordance with the BSI Table 1.3, "AD via LDAP is selected. Other (MFA, Auth App is selected, etc. Please confirm and update this response as needed. This response should MATCH Table 1.3.</p>                                                                                                                                                                                                                                                                                                |
| PIA 22  | Data Feed Service,                        | 5/11/2026 | <p>Please confirm Name verses</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

|         |                                           |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------|-------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|         | pta_pia_CDC_Release                       |           | username and update as needed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| PIA 30  | Data Feed Service,<br>pta_pia_CDC_Release | 5/11/2026 | Please confirm members of the public since there are no mentions of the public within the PTA. Please select Partners if available.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| PIA 31  | Data Feed Service,<br>pta_pia_CDC_Release | 5/11/2026 | Within PIA-30 it is indicated that members of the public are a source of PII in the system. Therefore, an OMB number is necessary. Please confirm and update as needed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| PIA 37  | Data Feed Service,<br>pta_pia_CDC_Release | 5/11/2026 | Please replace with "are" in "purposes is deleted".                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| PIA 42  | Data Feed Service,<br>pta_pia_CDC_Release | 5/11/2026 | Please define how often the "Specialized training" is completed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| PTA 04  | Data Feed Service,<br>pta_pia_CDC_Release | 5/12/2026 | Again, first use "FedRamp, sync ", please spell out, if applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| PTA 05  | Data Feed Service,<br>pta_pia_CDC_Release | 5/12/2026 | <p>1. Again, in accordance with the BSI Section 3, "Data processed by the system includes user account information, file metadata, and file content, which may include sensitive but unclassified (SBU) data." Please confirm and update/add these information/data types in this response and describe in PTA-6.</p> <p>2. Please define or provide an example concerning what " file metadata" consist of or contains.</p>                                                                                                                                                                                                                                |
| PTA 06  | Data Feed Service,<br>pta_pia_CDC_Release | 5/12/2026 | <p>1. Please define or provide an example concerning what " file metadata" consist of or contains.</p> <p>2. Please define or provide an example concerning what "file content, which may include sensitive but unclassified (SBU) data." consist of or contains.</p> <p>3. Please define or provide an example concerning what "sensitive but unclassified (SBU) data" consist of or contains.</p> <p>4. Please confirm the use of "name", as the URL goes to a site that ask for "username" or email address. The email address is identified in PTA-5 and PTA-6; however, the username is not identified in this responses. Please update as needed.</p> |
| PTA 05C | Data Feed Service,                        | 5/12/2026 | Again, In accordance with the BSI                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|        |                                           |           |                                                                                                                                                                      |
|--------|-------------------------------------------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        | pta_pia_CDC_Release                       |           | Table 1.3, "AD via LDAP is selected. Other (MFA, Auth App is selected, etc. Please confirm and update this response as needed. This response should MATCH Table 1.3. |
| PTA 04 | Data Feed Service,<br>pta_pia_CDC_Release | 5/13/2026 | Kiteworks FedRamp High (KWFH) is the official system name on file within the CDC Archer system.                                                                      |
| PTA 04 | Data Feed Service,<br>pta_pia_CDC_Release | 5/13/2026 | Again, first use "sync ", please spell out or provide an explanation, if applicable                                                                                  |
| PTA 05 | Data Feed Service,<br>pta_pia_CDC_Release | 5/13/2026 | Please confirm the use of "name" in "the secure transfer request: <b>name</b> , and email address." since "username" has been used in this response as well.         |
| PTA 06 | Data Feed Service,<br>pta_pia_CDC_Release | 5/13/2026 | Please confirm the use of "name" in "the secure transfer request: name, and email address." since "username" has been used in this response as well.                 |
| PIA 22 | Data Feed Service,<br>pta_pia_CDC_Release | 5/13/2026 | Again, please confirm " <b>Name</b> " verses username and update as needed. Add "Name" if applicable, as it is listed in PTA-5 and described in PTA-6.               |
| PTA 06 | Data Feed Service,<br>pta_pia_CDC_Release | 5/14/2026 | Please confirm this statement "CDC users which is used to initiate the secure transfer request: name, and email address." since it is different in PTA-5.            |
| PTA 04 | Data Feed Service,<br>pta_pia_CDC_Release | 5/14/2026 | Again, first use "sync ", please spell out or provide an explanation, if applicable                                                                                  |
| PTA 05 | Data Feed Service,<br>pta_pia_CDC_Release | 6/2/2026  | Write out AD upon first use.                                                                                                                                         |
| PIA 28 | Data Feed Service,<br>pta_pia_CDC_Release | 6/2/2026  | It appears that the legal authority you describe comes from provisions later in Title 42, § 242c and related sections, not actually §§ 2–67. Please make the update. |