




Copy PIA (Privacy Impact Assessment)

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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 - LAMS - QTR3 - 2023 - CDC6788550	PIA ID:	1679915
Name of Component:	CDC - Laboratory Animal Management System	Name of ATO Boundary:	Laboratory Animal Management System
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	498
Submission Status:	Re-Submitted	Submit Date:	10/25/2024
Next Assessment Date:	N/A	Expiration Date:	1/1/2100
Office:		OPDIV:	CDC
Security Categorization:	Low	OpDiv PIA ID:	CDC6788550
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.		9/27/2022
5:	Is the system or electronic information collection, agency or contractor operated?		Agency

PTA

PTA

PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	N/A
PTA - 3:	Is the data contained in the system owned by the agency or contractor?	Agency

<p>PTA - 4:</p>	<p>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.</p>	<p>The Centers for Disease Control and Prevention (CDC)-National Center for Emerging and Zoonotic Infectious Diseases (NCEZID)-Division of Scientific Resources (DSR) is the business and system owner for the Laboratory Animal Management System (LAMS), a Research Animal Facility Management System.</p> <p>LAMS provides automated functions for Facility Management, Census, Cost Accounting, Animal Health Records, and Training documentation.</p> <p>Additionally, system complies with federal guidelines for the Institutional Animal Care and Use Committee (IACUC) specific records management needs. IACUC protocols are to ensure specific requirements related to proper animal care and treatment are applied and to conform to Good Laboratory Practices (GLP) for animal research studies.</p> <p>Information types include Facility Management, Census, Cost Accounting, Animal Health Records, and Training documentation; user information including mail and email address, office phone number and name for protocol owners, and internal collaborators to comply with federal regulations related to proper animal care and treatment.</p>
<p>PTA - 5:</p>	<p>List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.</p>	<p>Information types include Facility Management, Census, Cost Accounting, Animal Health Records, and Training documentation; user information including mailing and email address, office phone number and name for protocol owners, and collaborators to comply with federal regulations related to proper animal care and treatment. Specifically, the LAMS system tracks:</p> <ul style="list-style-type: none"> a. Animal Disposition b. Protocol descriptions c. Animal usage per protocol d. Animal medical records <p>Users are identified through CDC's Digital Services Office (DSO) - Secure Access Management Services (SAMS). CDC Active Directory is used for authentication for staff. Active Directory is a separate system covered by a separate Privacy Impact Assessment.</p>
<p>PTA - 5A:</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. The system providing credentials is</p>
<p>PTA - 5B:</p>	<p>Please identify the type of user credentials used to access the system.</p>	

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.	Information collected by LAMS is in support of US Government animal research protocols (laboratory animal usage, care, management and ordering) and to comply with specific federal regulations related to proper animal care and treatment. Information types include Facility Management, Census, Cost Accounting, Animal Health Records, and Training documentation; internal Business Contact Information (name, mail and email address, office phone number and name for protocol owners, and collaborators to comply with federal regulations related to proper animal care and treatment. Specifically, the LAMS system tracks: a. Animal Disposition b. Protocol descriptions c. Animal usage per protocol d. Animal medical records CDC Active Directory is used for authentication for staff. Active Directory is a separate system covered by a separate Privacy Impact Assessment.
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	
PTA - 8:	Does the system include a website or online application?	Yes
PTA - 8A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	No
PTA - 9:	Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response.	The website is used internally for staff to access the system via SAMS.
PTA - 10:	Does the website have a posted privacy notice?	Yes
PTA - 11:	Does the website contain links to non-federal government websites external to HHS?	No
PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
PTA - 12:	Does the website use web measurement and customization technology?	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
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Employees/ HHS Direct Contractors
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	201 - 500
PIA - 4:	For what primary purpose is the PII used?	The primary purpose for PII to be used is to provide contact information for protocol documentation.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	Other uses for PII are to identify Users for system access and to verify training.
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	N/A
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	N/A
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	Animal Welfare Act; 9 CFR Parts 1, 2, and 3; Office of Laboratory Animal Welfare, Public Health Service (PHS) "Policy on Humane Care and Use of Laboratory Animals"; CDC Laboratory Animal Care and Use Policy; CDC Policy on Veterinary Authority Over Animals; Laboratory Animal Care and Use Policy (CDC-SA-2003-01)
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.	<p>Directly from an individual about whom the information pertains</p> <p>In-person</p> <p>Online</p> <p>Government Sources</p> <p>Within the OPDIV</p>
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.	<p>N/A. Information is not collected pursuant to the Paperwork Reduction Act (PRA): OMB Control Numbers are used for data collections subject to the Paperwork Reduction Act (PRA). PRA does not apply to data collections from agencies, instrumentalities, or employees of the United States in their official capacities. Information collected is only collected from government agencies, instrumentalities, and U.S. Government employees.</p> <p>Additionally, information required for user account creation, such as email address, username, password, and geographic location do not require PRA approval. Therefore, the PRA does not apply and the requirement to obtain an OMB collection approval number is N/A.</p>
PIA - 11:	Is the PII shared with other organizations outside the system's Operating Division?	Yes
PIA - 11A:	Identify with whom the PII is shared or disclosed.	<p>Other Federal Agency/Agencies</p> <p>Within HHS</p>
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	<p>Within HHS: To fulfill regulatory requirements via inspections and reviews by Office of Laboratory Animal Welfare (OLAW).</p> <p>Other Federal Agency/Agencies: To fulfill regulatory requirements via inspections and reviews by USDA.</p>

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)).	Office of Laboratory Animal Welfare (OLAW) is the office which is responsible for administering the U. S. Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals. It is located within the National Institutes of Health, Office of Extramural Research. An institution must have an OLAW approved Assurance statement in order to conduct animal research using PHS funds. Protocol information is also shared with the United States Department of Agriculture (USDA). USDA is responsible for administering the Animal Welfare Act and animal welfare regulations through the Animal and Plant Health Inspection Service.
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.	The only PII in the system is considered Business contact information from Federal Agencies. Inspections of standing protocols would include information obtained under PII. Per Animal Care and Use Policy Office (ACUPO): any time a protocol is released outside of CDC, we redact any PII from the protocol to protect the individuals. ACUPO never shares any PII outside of the agency (and all internal Business Contact Information PII within protocols are available from agency's phone book).
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 12A:	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
PIA - 13:	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	If the principal investigator (PI) / User chooses to opt out of the collection or use of their PII, then that personnel would either not submit protocol that contains their PII, or their protocol will not be processed. If User chooses to opt out after their information is collected in the system, User would contact their supervisor or LAMS Business Steward by work phone, work email, or in person to request deletion of that information, and Business Steward would instruct System Admins delete protocol along with any PII of that individual from the system.
PIA - 14:	Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of original collection). Alternatively, describe why they cannot be notified or have their consent obtained.	If major changes occur to system, such as disclosure and/or data uses have changed since the notice at the time of original collection, users would be contacted via the email or phone number listed on the protocols to request consent if warranted.
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.	If an individual has concerns about their PII being used inappropriately, they would contact ACUPO at: ACUPO Program Email: acupo@cdc.gov , the Division of Scientific Resources' Comparative Animal Branch or the Information Technology Security Office as necessary. Program (LAMS) can also remove user PII from the system if they don't wish to be involved with animal research any longer.

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.	Annually, the IACUC conducts a review of components in the protocols to determine whether the proposed projects are in accordance with the PHS Policy, the Animal Welfare Act (AWA), and the IACUC Guide and as to the accuracy of the protocol information. Additionally, LAMS is required to undergo Annual Reviews by the NCEZID Cybersecurity Team, which includes reviewing Privacy risk and Information Type(s) used by system.
PIA - 17:	Identify who will have access to the PII in the system.	Users Administrators 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.	Users: Submit, review, and approve protocols. Administrators: Manage Administrative maintenance and compliance of system. Contractors: Manage Administrative maintenance and compliance of system.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The Business Steward limits access to the least possible number of people necessary to access PII data for conducting official responsibilities through specific Role-based requirements. If the individual's manager determines that access to the system is required for the individual to perform their regular duties, they will make a request to the system administrator who will establish an account for the user to access the system. Access to PII is strictly enforce by setting up user profile on the Principle of Least Privilege and a Need-to-Know standard. Individuals can only see selected functions and information that are necessary for its valid purpose based on their user profile. PII data is identified as non-Sensitive Internal Business information and limited to authorized Administrators and Users.
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.	Access to application is based on Business Steward's validation for Role-Based Access Control (RBAC), where users are identified through CDC's DSO - SAMS. Users access via SAMS which operates under its own PIA. Principle of least privilege: system access is limited to the functions and information which is essential to job functions.
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.	All users are required to take Security and Privacy Awareness Training annually.

PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	All CDC employees who have access to PII/sensitive information are required to complete HHS/CDC Role based training.
PIA - 23:	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).	Records are maintained in accordance with General Records Schedule (GRS) and comply with CDC Records Control Schedule (RCS). In accordance with GRS 5.2, final reports are created to document programmatic decisions, policies, and other related issues and are maintained permanently (CDC RCS, B-321, 2&4). Other input/output records and system data that may be required for follow-up are disposed of after 10 years. Disposal methods include erasing computer tapes, burning or shredding paper materials or transferring records to the Federal Records Center when no longer needed for evaluation and analysis. In addition, electronic media is subject to zero-wipe pass (electronic destruction) methodology.
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 controls: Completion of training requirements; risk analyses performed annually; branch management reviewing access requests and granting minimal amount of access.</p> <p>Technical controls: Users are authenticated and data secured using operating system and server security, administered by the local system administrator. PII data is encrypted at rest and in transits with access restricted to specific authorized users as required by HHS and CDC policy.</p> <p>Physical- The server is housed on CDC property with security guards at the entrances to the property, individual user access credentials are required for each non-public building, floor, and office. Closed Circuit TV is also used by the internal security guards to check for and grant access to authorized individuals.</p>

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	10/29/2024
Privacy Analyst Comments:		Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	Approved on behalf of Beverly Walker	SOP Review Date:	11/4/2024
		SOP Days Open:	10

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	11/6/2024
Agency Privacy Analyst Review Comments:	Reviewer: Shanai Shobowale 11/6/2024 This PIA is ready for SAOP review and approval.	Agency Privacy Analyst Days Open:	2

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:		SAOP Review Date:	11/14/2024
		SAOP Days Open:	8

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 4	Data Feed Service, piafrmdc	10/21/2024	You have provided two primary purposes for the use of PII. Please move one to PIA-5.	
PIA - 13	Data Feed Service, piafrmdc	10/21/2024	<p>It is irrelevant that this tool only collects Business contact information, it is still PII! Please remove the first sentence.</p> <p>The question is looking for you to provide the method, policy or process for individuals to opt-out of the collection or use of their PII. If individuals cannot opt out after this system has collected their information, please explain why.</p>	
PIA - 14	Data Feed Service, piafrmdc	10/21/2024	It is irrelevant that this tool only collects Business contact information, it is still PII! Please remove the first sentence.	
PIA - 15	Data Feed Service, piafrmdc	10/21/2024	Please include ACUPO's contact information.	
PIA - 18	Data Feed Service, piafrmdc	10/21/2024	It is irrelevant that this tool only collects Business contact information, it is still PII! Please remove the first sentence.	

Admin Section

Is OpDiv Privacy Analyst Approved ?:	1	Is OpDiv Privacy Analyst Return ?	0
		Is SOP Return ?:	0
Is Agency Privacy Analyst Approve ?:	1	Is Agency Privacy Analyst Return ?:	0
Is SAOP Approved?:	1	Is SAOP Return ?:	0
Total Approved:	4	Total Return:	0
Total Approval Required:	4		

Miscellaneous Fields

Last Updated:	11/14/2024 11:01 PM	History Log:	View History Log
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