








Copy PIA (Privacy Impact Assessment)

Do you want to copy this PIA ?

Please select the user, who would be submitting the copied PIA.

Instructions


Review the following steps to complete this questionnaire:

- 1) Answer questions.** Select the appropriate answer to each question. Question specific help text may be available via the  icon. If your answer dictates an explanation, a required text box will become available for you to add further information.
- 2) Add Comments.** You may add question specific comments or attach supporting evidence for your answers by clicking on the  icon next to each question. Once you have saved the comment, the icon will change to the  icon to show that a comment has been added.
- 3) Change the Status.** You may keep the questionnaire in the "In Process" status until you are ready to submit it for review. When you have completed the assessment, change the Submission Status to "Submitted". This will route the assessment to the proper reviewer. Please note that all values list questions must be answered before submitting the questionnaire.
- 4) Save/Exit the Questionnaire.** You may use any of the four buttons at the top and bottom of the screen to save or exit the questionnaire. The  button allows you to complete the questionnaire. The  button allows you to save your work and close the questionnaire. The  button allows you to save your work and remain in the questionnaire. The  button closes the questionnaire without saving your work.

Acronyms

ATO - Authorization to Operate
CAC - Common Access Card
FISMA - Federal Information Security Management Act
ISA - Information Sharing Agreement
HHS - Department of Health and Human Services
MOU - Memorandum of Understanding
NARA - National Archives and Record Administration
OMB - Office of Management and Budget
PIA - Privacy Impact Assessment
PII - Personally Identifiable Information
POC - Point of Contact
PTA - Privacy Threshold Assessment
SORN - System of Records Notice
SSN - Social Security Number
URL - Uniform Resource Locator

General Information

PIA Name:	CDC - CDC-MASH - QTR2 - 2024 - CDC8276843	PIA ID:	1833413
Name of Component:	CDC - CDC Management and Services Hub	Name of ATO Boundary:	CDC Management and Services Hub
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	104
Submission Status:	Re-Submitted	Submit Date:	7/25/2024
Next Assessment Date:	N/A	Expiration Date:	8/28/2027
Office:		OPDIV:	CDC
Security Categorization:	Low	OpDiv PIA ID:	CDC8276843
Legacy PIA ID:		Make PIA available to Public?:	Yes
1:	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
2:	Is this a FISMA-Reportable system?		Yes
3:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
4:	ATO Date or Planned ATO Date.		
5:	Is the system or electronic information collection, agency or contractor operated?		Contractor

PTA

PTA		
PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	Center for Surveillance, Epidemiology, and Laboratory Services (CSELS) will be added to the existing Salesforce system. Since the last PIA, a new user provisioning app has been built into the Salesforce org to streamline the addition of new external users. The PHIVE portal was added to the Salesforce org and subsequently moved out after a short period.
PTA - 3:	Is the data contained in the system owned by the agency or contractor?	Agency
PTA - 4:	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions.	The PHI (Public Health Infrastructure) Hub is a web-based system used to track, log, manage, and centralize information related to technical assistance for the new PHI grant.

PTA - 5:	List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.	The application will be built upon Salesforce Lightning and Community clouds, with data stored in GovCloud Plus which is FedRamp approved. The system will provide a central location for internal coordination and collaboration for grant management, contact management, communications management and report. Information such as name, email, phone number, mailing address, performance measures, and user credentials will be input into the system by government employees or voluntarily added by external recipients. Data access will be role based with least privilege access. Users will access the system via secure access management system (SAMS). SAMS is a system with its own PIA. CSELS will provide the opportunity for improvement in awardee-to-awardee collaboration, improving knowledge sharing and implementation of best practices.
PTA - 5A:	Are user credentials used to access the system?	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
PTA - 5B:	Please identify the type of user credentials used to access the system.	
PTA - 6:	Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual.	<p>The system will record administrative and programmatic technical assistance requests, work plan data, awardee information, and programmatic resources and guidance.</p> <p><i>Information such as name, email, phone number, mailing address, performance measures, and user credentials are all collected for creating a user's profile in Salesforce as well as their contact information. This is utilized when working through TA requests in the system and aids in providing information to contact the individuals putting in the TA request as well as the information for the person working the TA request. The federation id (email) is stored in the system</i></p> <p>Name, email, health dept, federation id (email) – information is stored indefinitely</p>
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	No
PTA - 8:	Does the system include a website or online application?	No
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.	
PTA - 10:	Does the website have a posted privacy notice?	
PTA - 11:	Does the website contain links to non-federal government websites external to HHS?	
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?	
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?	
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 - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address Phone numbers Mailing Address User Credentials
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Business Partners/Contacts (Federal, state, local agencies) Employees/ HHS Direct Contractors
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	201 - 500
PIA - 4:	For what primary purpose is the PII used?	PII is needed to create unique users in the system.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	PII is also used to monitor progress of regular business activities for funded recipients, such as technical assistance, work plans, and progress reports.
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.	Occupational Safety and Health Act, Section 20, "Research and Related Activities" and Section 21, "Training and Employee Education" (29 U.S.C. 669, 670).
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.	N/A
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.	09-20-0055, Administrative Files for Research/ Demonstration and Training Grants, and Cooperative Agreements
PIA - 9:	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains Hard Copy Mail/Fax Email Online Government Sources Within the OPDIV State/Local/Tribal
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.	Information collection is done at a local level where the individual organizations provide their own OMB collection approval numbers.
PIA - 11:	Is the PII shared with other organizations outside the system's Operating Division?	No
PIA - 11A:	Identify with whom the PII is shared or disclosed.	
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	
PIA - 11C:	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	
PIA - 11D:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII. If no process or procedures are in place, please explain why not.	
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 12A:	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
PIA - 13:	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	There is no option to opt out of including their PII including mailing address, email, and name. This information is needed for business processes such as basic communication. Opting out will prevent system access for the individual.
PIA - 14:	Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of original collection). Alternatively, describe why they cannot be notified or have their consent obtained.	Email notifications will be provided as needed.
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.	Internal review and removal of individual's information as required can be completed by contacting the point of contact in Salesforce.
PIA - 16:	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy. Please address each element in your response. If no processes are in place, explain why not.	The Enterprise Performance Life Cycle (EPLC) Agile framework methodology was adopted where regular stage gate reviews are performed with critical partners and local IT governance officials. The stage gate reviews is an evaluation process by which the project is authorized to progress from one life cycle phase to the next if it meets a certain set of criteria and is approved. Annual reviews with Information System Security and Privacy Officer (SSPO) will also be performed for Authority to Operate (ATO) renewal.
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?	No

PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	<p>Users : For contact management purposes.</p> <p>Admin: For user provisioning and management.</p> <p>Contractor: Direct contractors will have access for development and maintenance.</p>
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	System users will be able to see contact information for relationships that they are responsible for maintaining. Permissions will be role based with least privilege access.
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.	Users will only access information for relationships which they are responsible for maintaining. Permissions will be role based with least privilege access. All users must be approved by the Business Steward based on their role, duties and responsibilities prior to gaining access to the data. The roles are predefined and users are assigned those roles as appropriate.
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.	Internal users will be required to complete HHS Privacy and Security Training.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	None
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).	While data is stored in the GovCloud, records retention will follow standard CDC records retention schedules. For grants and cooperative agreements (N1-442-97-1): Cut off closed grant, contract, or cooperative agreement files at the end of the calendar year in which the project ends or a final report is written. Maintain in office two years after cut off. Transfer to Federal Records Center (FRC) and destroy six years after cut off. For employee related information such as user credentials and routine administrative files (NC1-90-82-4): Cut off at the end of the calendar year. Transfer to the FRC when 1 year old. Destroy when 5 years old.
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: Records are maintained according with CDC's record control schedule and record control policy. This information is secured using the CDC Active Directory authentication process and role-based application controls.</p> <p>Technical: The controls include user authentication/authorization, firewalls and encryption. Data obfuscation is applied to user roles based on authorization. Unauthorized users do not have access to PII.</p> <p>Physical: This system is located within a building with security guards at the front door and locked doors requiring a key card for entry.</p>

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	7/25/2024
Privacy Analyst Comments:	OpDiv Analyst: Joshua Mosios (Contractor)	Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	Approved on behalf of Beverly Walker	SOP Review Date:	7/25/2024
		SOP Days Open:	0

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	8/5/2024
Agency Privacy Analyst Review Comments:	Reviewer: Crystal Bland 8/5/2024 This PIA is ready for SAOP review and approval. Per CDC email (see Supporting Documentation), we confirm that PHIVE stands for Public Health Infrastructure Virtual Engagement.	Agency Privacy Analyst Days Open:	11

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:	For next iteration of PTA: PIA-1: Per PTA-6 please include "health department" and "Federation ID." Per CDC email (see Supporting Documentation), we confirm that PHIVE stands for Public Health Infrastructure Virtual Engagement.	SAOP Review Date:	8/28/2024
		SAOP Days Open:	23

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
8-5-2024 EMAIL_Re_CDC - CDC-MASH - QTR2 - 2024 - CDC8276843.pdf	218805	.pdf	8/5/2024 10:20 AM	0

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmcdc	5/23/2024	Please select "user credentials"	
PIA - 8A	Data Feed Service, piafrmcdc	7/10/2024	The items listed are not PII. Please contact the privacy office if clarification is needed. PII includes but is not limited to data elements like name, ssn, email address, etc.	
PIA - 15	Data Feed Service, piafrmcdc	7/11/2024	where is the point of contact located?	
PIA - 16	Data Feed Service, piafrmcdc	7/11/2024	We are no longer using the term "ISSO"	
PIA - 8	Data Feed Service, piafrmcdc	7/16/2024	This answer does not align with 8A. Please revise one or both.	
PIA - 1	BLAND, CRYSTAL	7/26/2024	On the next iteration of the PTA: Spell out acronyms the first time used, "PHIVE," and "FEDRAMP." PIA-1: Per PTA-6 please include "health department" and "Federation ID."	

Admin Section

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

Miscellaneous Fields

Last Updated:	8/28/2024 8:01 PM	History Log:	View History Log
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