


Copy PIA (Privacy Impact Assessment)



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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 - NVSS - QTR3 - 2024 - CDC8381016	PIA ID:	2079701
Name of Component:	CDC - National Vital Statistics System	Name of ATO Boundary:	National Vital Statistics System
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	30
Submission Status:	Re-Submitted	Submit Date:	8/13/2024
Next Assessment Date:	08/22/2027	Expiration Date:	8/22/2027
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC8381016
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?		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.	PTA submission is required as part of the authorization requested documents/ PIA validation. The Governance, Risk and Compliance (GRC) tool migrated from Trusted Agent to Archer in 2023.
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 National Vital Statistics System (NVSS) is responsible for producing the nation's official vital statistics. NVSS collects data from all states vital records to produce mortality, medical, and demographic statistics. National Center for Health Statistics (NCHS) receives highly comparable data from all registration area through NVSS, and then processes, tabulates, analyzes, and disseminates demographic and medical information which are vital for national statistics reporting. Specific components of the National Vital Statistics System Include-Births, Deaths, Fetal Deaths, Linked Birth/Infant Death

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.

Data that identifies and highlights public health and demographic trends are collected from birth, death, and fetal death records for statistical (aggregate) analysis. No PII or Information in Identifiable Form (IIF) is used in such analysis and no PII/IIF is included in publications that result from the analysis work.

Public Use datasets are created from the final annual datasets, with a screened subset of the available data elements. No PII/IIF is included in any public use dataset. Death data with identifiable information such as Name, date of birth, Social Security number, and cause of death (medical notes) is collected in the NVSS for use by the National Death Index (NDI). The identifiable information is used for linking deaths to researchers data for approved projects. These linkages are conducted internally and identifiable information from the NDI is not returned to the researcher.

The NVSS utilizes selected Vital Statistics data from Birth, Death, and Fetal Death registrations for public health proposes. The data collected is based on the US Standard Certificates of Birth and Death and the US Standard Report of Fetal Death from 57 jurisdictions. The source data for the NVSS comes in the form of selected vital record certificate data in flat-file data transmissions. The data travels through a secure (encrypted) connection into the CDC Secure Access Management Services (SAMS). The final results of the NVSS are shown in aggregate de-identified form in annual NCHS publications (Deaths, Births, Perinatal Mortality, etc.), and in "QuickStats", through the CDC Wonder, and in other forms combined with survey and other external data in special subject area reports.

NVSS relies on CDC's enterprise-wide common controls for authentication services (i.e. Active Directory, Secure Access Management System (SAMS), PIV cards & Public Key Infrastructure, RSA fob by exception). As such, CDC intranet access is a prerequisite for access to NVSS. NVSS utilizes Active Directory UserIDs in order to apply Role-Based Access Controls (RBAC). Active Directory and SAMS are separate systems covered by separate PIAs. NVSS does not store CDC network passwords.

The data is kept in NVSS for 7 years and deleted.

PTA - 5A:

Are user credentials used to access the system?

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 NVSS utilizes selected Vital Statistics data from Birth, Death, and Fetal Death registrations for public health proposes. The data collected is based on the US Standard Certificates of Birth and Death and the US Standard Report of Fetal Death from 57 jurisdictions. The source data for the NVSS comes in the form of selected vital record certificate data in flat-file data transmissions. The data travels through a secure (encrypted) connection into the CDC Secure Access Management Services. The final results of the NVSS are shown in aggregate de-identified form in annual NCHS publications (Deaths, Births, Perinatal Mortality, etc.), and in "QuickStats", through the CDC Wonder, and in other forms combined with survey and other external data in special subject area reports.</p> <p>Death data with identifiable information such as Name, date of birth, Social Security number, and cause of death (medical notes) is collected in NVSS and used by National Death Index (NDI). The identifiable information is used for linking deaths to researchers' data for approved projects. These linkages are conducted internally and identifiable information from the NDI is not returned to the researcher.</p>
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	Yes
PTA - 8:	Does the system include a website or online application?	
PTA - 8A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	No
PTA - 9:	Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response.	<p>The National Vital Statistics System (NVSS) is responsible for producing the nation's official vital statistics. NVSS collects data from all states vital records to produce mortality, medical, and demographic statistics. National Center for Health Statistics (NCHS) receives highly comparable data from all registration area through NVSS, and then processes, tabulates, analyzes, and disseminates demographic and medical information which are vital for national statistics reporting. Specific components of the National Vital Statistics System Include-Births, Deaths, Fetal Deaths, Linked Birth/Infant Death. NVSS does not permit guest, anonymous, emergency, or temporary access. Individual access, Developer and Non-Developer users access resources via Active Directory group access. All user access is based on intended system usage and associated missions/business functions, based on the users' position description (PD). Authorized users of the system include federal and contract staff. NVSS cannot be accessed on external systems. NVSS can only be accessed from within the CDC Intranet by verified credentialed NVSS users.</p>
PTA - 10:	Does the website have a posted privacy notice?	Yes
PTA - 11:	Does the website contain links to non-federal government websites external to HHS?	No

PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
PTA - 12:	Does the website use web measurement and customization technology?	Yes
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	Session Cookies - Does Not Collect PII
PTA - 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA - 13A:	Does the website collect PII from children under the age thirteen?	
PTA - 13B:	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PTA - 14:	Does the system have a mobile application?	No
PTA - 14A:	Is the mobile application HHS developed and managed or a third-party application?	
PTA - 15:	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
PTA - 16:	Does the mobile application/ have a privacy notice?	
PTA - 17:	Does the mobile application contain links to non-federal government websites external to HHS?	
PTA - 17A:	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
PTA - 18:	Does the mobile application use measurement and customization technology?	
PTA - 18A:	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
PTA - 19:	Does the mobile application have any information or pages directed at children under the age of thirteen?	
PTA - 19A:	Does the mobile application collect PII from children under the age thirteen?	
PTA - 19B:	Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PTA - 20:	Is there a third-party website or application (TPWA) associated with the system?	No
PTA - 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

PIA		
PIA		
PIA - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Social Security Number Name Date of Birth Other - Free text Field - Medical Notes
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Members of the public
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000

PIA - 4:	For what primary purpose is the PII used?	NCHS receives a copy of selected data items through a voluntary contract with the states and under a data use agreement governing how the data can be used. The PII information (e.g., Name, Social Security Number, and medical notes) are obtained for the death records and not the birth records. These data items are provided by states once to NCHS for the NVSS and then the NVSS ships that information over to our National Death Index (NDI). Death certificate names and social security numbers are only needed in the National Death Index to facilitate linkage of client list from researchers who are tracking their clients in a longitudinal study to determine whether or not they have died and if so the cause of death.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	Data are shared with NDI for the purposes of setting up unique (non-public) search records.
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	Social security numbers are only needed in the NDI and it is used in that system to facilitate linkage of client list from researchers who are tracking their clients in a longitudinal study to determine whether or not they have died and if so the cause of death.
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	Executive Order 9397
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	Public Health Service Act, Section 306(h) (42 U.S.C. 242k)
PIA - 8:	Are records in the system retrieved by one or more PII data elements?	Yes
PIA - 8A:	Please specify which PII data elements are used to retrieve records.	Name Date of Birth Social Security Number
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.	09-20-0166 SORN 09-20-0166 Vital Statistics for Births, Deaths, Fetal Deaths, Marriages, and Divorces Occurring in the United States During Each Year. HHS Exempt Systems of Records HHS.gov
PIA - 9:	Identify the sources of PII in the system.	Government Sources State/Local/Tribal Non-Government Sources Members of the Public
PIA - 10:	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes
PIA - 10A:	Provide the information collection approval number.	OMB Number 0920-0213,
PIA - 10B:	Identify the OMB information collection approval number expiration date.	7/31/2025

PIA - 10C:	Explain why an OMB information collection approval number is not required.	N/A
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.	Within HHS
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	Transferred to NDI for purposes of data linkage.
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)).	The information is obtained from state vital statistics offices, under the Vital Statistics Cooperative Program (VSCP) contractual agreement which stipulated how the data may be used. All information obtained is only on deceased persons.
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.	Access to record systems which have been granted an exemption from the Privacy Act access requirement may be made at the discretion of the system manager. Positive identification is required from anyone seeking access. In such cases, an individual may also request an accounting of disclosures of his or her record, if any, from the system manager.
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 12A:	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
PIA - 13:	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	The PII is obtained voluntarily from state vital statistics offices via the Vital Statistics Cooperative Program (VSCP) contract. States that elect to not participate can do so by not signing their VSCP contract for NDI data.
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.	Data are collected on birth and death certificates according to State laws that regulate these official administrative records. It is the responsibility of the States, therefore, to notify respondents how their data will be used for both administrative and statistical/public health purposes. PII is of the deceased.
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.	Contact the system manager (Deputy Director, Division of Vital Statistics) and reasonably identify the record, specify the information being contested, and state the corrective action sought, with supporting information to show how the record is inaccurate, incomplete, untimely, or irrelevant.
PIA - 16:	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy. Please address each element in your response. If no processes are in place, explain why not.	No process is in place. The NVSS is a statistical file and as such no PII data are retained in this system. The PII data once collected is stripped from this system and transferred to the National Death Index (NDI), which retains PII. Data integrity/accuracy/relevancy /availability as it relates to the PII is then performed within that system (NDI).

PIA - 17:	Identify who will have access to the PII in the system.	Users Developers
PIA - 17A:	Select the type of contractor.	
PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	
PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Users perform medical coding of mortality certificates provided by the states. Also review validation errors and provide feedback to the states on mortality certificates. Developers must create and maintain tools utilized by the users, including but not limited to data entry tools, medical coding and quality control tools, and validation reports. Communication between the developers and users at times requires referencing specified records which contain PII.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Users roles are designated by the business owner. NVSS stewards have delegated responsibilities to grant access. Users are granted access based on their need to edit and de-identify the data. Access and privileges are granted based on user roles.
PIA - 20:	Describe the technical methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.	The Least Privilege Model is enforced via Active Directory and application-level user groups. Individual role access defines the permissions granted to the individual users. Users may only access data that pertains to their role.
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.	Annual Security and Privacy Awareness 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).

Records are retained and disposed in accordance with the Scientific and Research Project Records, Records Control Schedule, N1-442-09-1. All copies of the individually identifiable records are retained in file shares until computer files are imported and verification of information is completed. The retention schedule, as stated in the Vital Statistics Cooperative Program (VSCP) contract with each jurisdiction, is as follows for vital statistics source documents: Delete or return to the registration area copies of source documents for all vital statistics events three months after the release of the Advance Report. If problems are detected prior to or following the release of the Advance Report, copies of the source documents may be retained until the problems are resolved but not later than the date the Annual Volumes are released. In no case shall copies be retained more than 48 months after the end of the data year (e.g., December 31, 2023 for data year 2019) unless specific permission is requested from the States. All releases of data based on NCHS use of source documents shall meet NCHS confidentiality regulations and any other restrictions contained in the state's contract.

PIA - 24:

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

Administrative controls: Access is restricted to a limited number of users and is governed by CDC Privacy and Confidentiality policies. Users receive annual Privacy and Security training. Users sign NVSS Rules of Behavior before gaining access to the system.

Technical controls: Access to the NVSS system is controlled by Windows Integrated Authentication requiring smartcard login with dual authentication to access. The data is encrypted and maintained in a dedicated database with restricted access.

Physical controls: The data center is protected with Security Guards, physical access controls, software and hardware firewalls, and user access authentication.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	8/14/2024
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:	8/14/2024
		SOP Days Open:	1

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	8/16/2024
Agency Privacy Analyst Review Comments:	Reviewer: Nestor Villafuerte 8/16/2024 The comments were for updates on the next iteration of the PTA. 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:	On the next iteration of the PTA please update the URL Details: Per PTA-5, please provide URL types and PTA-5A: Per PTA-5, the response should be 'Yes, but PTA-8: Per PTA-5, the response should be "Yes."	SAOP Review Date:	8/22/2024
		SAOP Days Open:	6

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	8/13/2024	State "medical notes" instead of "medical records" as stated in the list of PII above.	
PIA - 6A	Data Feed Service, piafrmdc	8/13/2024	None of the citations listed provide the legal authority to use social security numbers; however, based on the use provided Executive Order 9397 applies. Please delete the others listed.	
PIA - 1	VILLAFUERTE, NESTOR	8/15/2024	PTA-5a - Please provide a response. PTA-8 - Reviewer notes that this failed to sync.	
PIA - 1	BLAND, CRYSTAL	8/16/2024	On the next iteration of the PTA please update the following: URL Details: Per PTA-5, please provide URL types and list URL (intranet site). PTA-5A: Per PTA-5, the response should be 'Yes, but user credentials are maintain by another system.' PTA-8: Per PTA-5, the response should be "Yes."	

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:	8/22/2024 8:01 PM	History Log:	View History Log
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