

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 - NCHS-GCC - QTR2 - 2025 - CDC8731680	PIA ID:	3462680
Name of Component:	CDC - NCHS Genesys Cloud CX	Name of ATO Boundary:	NCHS Genesys Cloud CX
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	49
Submission Status:	Re-Submitted	Submit Date:	8/1/2025
Next Assessment Date:	08/11/2028	Expiration Date:	8/11/2028
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC8731680
Legacy PIA ID:		Make PIA available to Public?:	Yes
1:	Identify the Enterprise Performance Lifecycle Phase of the system.		Development
2:	Is this a FISMA-Reportable system?		Yes
3:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		No
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.	New
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	
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.	<p>NCHS Genesys Cloud CX (NCHS-GCC) is the phone system for the National Center for Health Statistics (NCHS) that conducts phone interviews of the survey participants (SPs). The purpose of the NCHS-GCC phone system is to collect data on the health of Americans. All major diseases, risk factors and behaviors, environmental exposures, and relationship between diet, health, and nutrition are assessed.</p> <p>The collected data is transferred to National Health and Nutrition Examination Survey (NHANES) and is used to measure the prevalence of numerous chronic diseases and risk factors, to measure exposure to hundreds of environmental chemicals, and to measure the nutritional intake of the population of the United States of America.</p>

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.	<p>The NHCS-GCC system collects, analyzes and disseminates data about the health of Americans. All major diseases, risk factors, behaviors, environmental exposures, and the relationship between diet, health and nutrition are assessed. The system collects and processes health and nutritional information annually from adults and children in the United States.</p> <p>Personally Identifiable Information (PII) is collected for contact purposes. The contact information collected is used to follow-up on survey participant to report results of medical tests and for participation in active and passive longitudinal research. NCHS-GCC collects the following types of PII: Name; Date of Birth; Mother's Maiden Name; E-Mail Address; Mailing Address; Phone Numbers; Military Status; Employment Status; Foreign Activities; Medical Notes, Biometric Identifiers (i.e., recording of conversations),</p>
PTA - 5A:	Are user credentials used to access the system?	
PTA - 5B:	Please identify the type of user credentials used to access the system.	<p>Non-HHS User Credentials</p> <p>Username</p> <p>Password</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.	<p>Survey data (e.g., NHANES) is collected during the survey to produce aggregated anonymized data on the status of health of the population of the United States.</p> <p>The PII data is collected to allow future contact with a survey participant to report results of medical tests and for future longitudinal research both passive and active.</p> <p>PII is collected for contact purposes. The contact information collected is used to follow-up on survey participant to report results of medical tests and for participation in active and passive longitudinal research. PII (Name; Date of Birth; Mother's Maiden Name; E-Mail Address; Mailing Address; Phone Numbers; Military Status; Employment Status; Foreign Activities; Medical Notes, Biometric Identifiers (i.e., recording of conversations).</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?	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)?	

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 link : https://login.use2.us-gov-pure.cloud is used for user login for the system.</p> <p>Call center representatives that call survey participants have access to website to log in and collect survey information.</p> <p>Authentication with the system is performed via Security Assertion Markup Language (SAML) against contractors AD environment. It is governed by a conditional access policy that requires the use of an contractor device and end user credentials. Part of compliance is the requirement that the device contain a Trusted Platform Module (TPM) chip, which qualifies the laptop as a single-factor cryptographic device (as per NIST 800-63B). This in conjunction with AD makes the authentication an Multifactor Authentication (MFA). Additionally, a successful Time-based One Time Password (TOTP) push via Microsoft Authenticator is required for initial login and may be required subsequently.</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?	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?	
PTA - 13A:	Does the website collect PII from children under the age thirteen?	Yes
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?	Yes
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 Mother Maiden Name Email Address Phone numbers Military Status Foreign Activities Date of Birth Biometric Identifiers Mailing Address Employment Status Other - Free text Field - All major diseases, risk factors, behaviors, environmental exposures, and the relationship between diet, health and nutrition.
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?	National Center for Health Statistics Genesys Cloud CX (NCHS-GCC) collects Personally Identifiable Information (PII) and transfers the collected PII to a different system, National Health and Nutrition Examination Survey (NHANES) Security Authorization Boundary.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	Not Applicable (N/A)
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	Not Applicable (N/A)
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	Not Applicable (N/A)

PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	The legal authorities governing information use and disclosure are granted in: 1. Public Health Service Act, Title 42, US Code, Paragraph 242k - National Center for Health Statistics; 2. Food Quality Protection Act of 1996 (P.L. 104-170), Title III - Data Collection Activities to Assure the Health of Infants and Children and Other Measures, SEC. 301; 3. Food, Conservation, and Energy Act of 2008 (P.L. 110-234), SEC. 4403. Joint Nutrition Monitoring and Related Research Activities; 4. Federal Food, Drug, and Cosmetic Act (21 USC 393) Title 21 - Food and Drugs, Chapter 9 - Federal Food, and Cosmetic Act - Subchapter IX - Miscellaneous - SEC. 393. Food and Drug Administration (21 USC 393)
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.	Phone numbers
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.	09-20-0164 "Health and Demographic Surveys 09-20-0164 "Health and Demographic Surveys Conducted in Probability Samples of the United States Population. HHS/CDC/NCHS."
PIA - 9:	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains Phone 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.	Office of Management and Budget (OMB) information collection approval number 0920-0950
PIA - 10B:	Identify the OMB information collection approval number expiration date.	1/31/2028
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?	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.	Since NCHS-GCC functions solely as the phone system used by NHANES, there is no separate consent form or opt-out mechanism for participants at this stage. Consent for data collection is obtained directly by NHANES prior to the phone interview.
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.	Since NCHS-GCC serves solely as the phone system for NHANES, there is no process in place to notify participants of major changes at this stage. Any announcements or updates regarding changes to data collection are communicated directly by NHANES.
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.	As NCHS-GCC functions solely as the phone system for NHANES, all complaints are handled by NHANES staff. If an individual submits a complaint, a report is filed with the NCHS Ethics Review Board (ERB), and each case is reviewed on an individual basis. For public inquiries, the hotline number is 1-800-223-8118. The ERB can also be contacted via email at nchs-erb@cdc.gov . The NCHS Ethics Review Board is located at 3311 Toledo Road, Hyattsville, MD 20782.
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.	As NCHS-GCC operates solely as the phone system for NHANES, the responsibility for conducting the annual review lies entirely with NHANES. This review is carried out by the Director of the Division of Health and Nutrition Examination Surveys (DHANES) and the NCHS Confidentiality Officer. Additionally, NHANES staff undergo annual training to ensure the integrity, availability, accuracy, and confidentiality of NHANES data.
PIA - 17:	Identify who will have access to the PII in the system.	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.	Direct contractors are responsible for collecting information from survey participants. That information is then transferred to the NHANES security authorization boundary, which has a distinct PIA and ATO issued by HHS/CDC.

PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Direct contractors, who are the only system users with access to personally identifiable information (PII), are required to complete NCHS Confidentiality training and sign the NCHS Non-Disclosure Agreement (NDA) as well as an affidavit of non-disclosure. Additionally, users must acknowledge and sign the HHS/CDC and CIPSEA Rules of Behavior.
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.	Role-based access to Personally Identifiable Information (PII) implements need-to-know principal to ensure least privilege requirements. As such, user roles are provided with the minimum access needed to perform their 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.	Annual IT Information Security Awareness Training (ISAT) Annual Overview of Records Management
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	Direct contractors, who are the only system users must complete the following required trainings: Annual Designated Agent training in accordance with Confidential Information Protection and Statistical Efficiency Act (CIPSEA). Furthermore, every user must sign an annual Non-disclosure Affidavit.
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).	The NCHS-GCC system is a pass through for the National Health and Nutrition Examination Survey (NHANES). Once the data is transmitted to the NHANES Security Authorization boundary which has its own PIA and Authorization to Operate (ATO), the data is kept indefinitely. Records Schedule Number: N1-442-09-1

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 are implemented to educate system users about their responsibilities in protecting Personally Identifiable Information (PII) and to legally bind them to these responsibilities. These controls include:

Mandatory signing of CDC Rules of Behavior and non-disclosure agreements by all employees and contractors as a condition of employment.

Regular personnel screening in accordance with CDC requirements.

Annual mandatory CDC privacy and security awareness training, as well as records management training for all users.

Annual System Security Assessment, including a review of all security controls, NCHS-GCC network and system architecture, and system/network security.

Monthly system security reviews and analysis.

Regularly scheduled data backups.

Technical controls are in place to safeguard data and systems through various mechanisms, including User identification and authentication, Password protection and two-factor authentication, Firewalls and virtual private network (VPN) access to secure data transmission, Data encryption to protect sensitive information, Intrusion Detection Systems (IDS) to monitor and respond to threats, Monthly and weekly system security scans, Monitoring and replacement/duplication of equipment in case of failure and Role-based access to data to ensure least privilege and accountability.

Physical controls are in place and designed to restrict physical access to sensitive systems and data. These include security guards stationed at entry points, the use of ID badges and key cards for access, closed-circuit television (CCTV) surveillance, servers containing PII are housed in locked cages within access-controlled rooms and two-factor authentication is required for entry into both Primary and Alternate Data Centers.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	8/1/2025
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:	8/7/2025
		SOP Days Open:	6

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	8/12/2025
Agency Privacy Analyst Review Comments:	Reviewer: Nestor Villafuerte 8/12/2025 We have confirm the following responses and this PIA is ready for SAOP review and approval: What is the planned ATO date? the ATO has not been grated for NCHS-GCC yet. PTA-5A: Are user credentials used to access the system? Yes PTA-8: Is supposed to be "No." Making the remaining website questions a moot point. PTA-8A: Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)? PTA-13: Does the website have any information or pages directed at children under the age of thirteen?	Agency Privacy Analyst Days Open:	5

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature Page.docx
SAOP Comments:	Approved on behalf of the SAOP	SAOP Review Date:	8/12/2025
		SAOP Days Open:	0

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
8-12-2025 EMAIL_Re_CDC - NCHS-GCC - QTR2 - 2025 - CDC8731680.pdf	264951	.pdf	8/12/2025 1:43 PM	0
Copy_of_NCHS-GCC_PIA_bl (18).rtf	268109	.rtf	8/12/2025 1:43 PM	0

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmcdc	7/8/2025	The Medicare Health Insurance Claim Number is not listed in PTA 5 and 6, please update as applicable.	
PIA - 6	Data Feed Service, piafrmcdc	7/8/2025	Please submit a SSN form since SSN is collected as indicated here. https://intranet.cdc.gov/ocio/information-systems-security/privacy/docs/SSN-Usage-Reduction-Elimination-Approval.pdf . Also include SSN collection in PTA 5 and 6.	
PIA - 8A	Data Feed Service, piafrmcdc	7/8/2025	Please remove Date of Birth and address, since these cannot be used as an identifier without additional information.	
PIA - 8B	Data Feed Service, piafrmcdc	7/8/2025	Delete once occurrence of 09-20-0164 "Health and Demographic Surveys since it is listed twice.	
PIA - 9	Data Feed Service, piafrmcdc	7/8/2025	Please review and add additional sources of information gathering e.g. online, by phone, by email, hard copy mail/fax etc. as applicable.	
PIA - 16	Data Feed Service, piafrmcdc	7/8/2025	Please spell out DHANES	
PIA - 19	Data Feed Service, piafrmcdc	7/8/2025	Role based is more of a technical control, please list the administrative policies and controls e.g. trainings here.	
PIA - 20	Data Feed Service, piafrmcdc	7/8/2025	Please review for grammar.	
PIA - 21	Data Feed Service, piafrmcdc	7/8/2025	Remove employee and contractor have to sign an annual Nondisclosure Affidavit, and Annual Designated Agent training.	
PIA - 22	Data Feed Service, piafrmcdc	7/8/2025	Do not relist items listed in PIA 21, please remove duplicates.	
PIA - 1	Data Feed Service, piafrmcdc	7/24/2025	Based on prior discussions please remove Medical Notes.	

PIA - 4	Data Feed Service, piafrmdc 7/24/2025	Based on previous discussions and updates please update all descriptions including those in PTA 4, 5, and 6 to reflect only what is in the Genesys Cloud boundary.
PIA - 5	Data Feed Service, piafrmdc 7/24/2025	Please update to reflect the purpose of Genesys cloud and not the receiving system.
PIA - 6	Data Feed Service, piafrmdc 7/24/2025	Per previous discussions the BSI has been updated to reflect that SSN is not collected.
PIA - 13	Data Feed Service, piafrmdc 7/24/2025	Since this is a phone system, what medium is used to transmit the consent documents? Are the signed documents stored within Genesys Cloud or in the receiving system?
PIA - 14	Data Feed Service, piafrmdc 7/24/2025	Is this information related to Genesys Cloud or to NHANES? if done via NHANES system, please state that.
PIA - 16	Data Feed Service, piafrmdc 7/24/2025	For context, please include that NHANES staff are the ones using Genesys Cloud to conduct and record the surveys over the phone.
PIA - 18	Data Feed Service, piafrmdc 7/24/2025	Could you please elaborate on the responses? Specifically, what type of data are the contractors collecting?
PIA - 19	Data Feed Service, piafrmdc 7/24/2025	<p>Please review the question and update it for grammar. For example, a response might be: During the onboarding process, the team ensures that the individual requesting access has a legitimate need to know. Once verified, users can access the resources necessary for their roles.</p> <p>Spell out all acronyms.</p>
PIA - 24	Data Feed Service, piafrmdc 7/24/2025	Updated the sections for grammar.
PIA - 1	VILLAFUERTE, NESTOR 8/11/2025	<p>Does the system have a planned ATO date?</p> <p>For PTA-8A please select "Yes".</p> <p>Reviewer notes that PTA-13 failed to sync.</p>

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:	8/12/2025 4:01 PM	History Log:	View History Log
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