

Date Approved: 4/27/2026

**General Information**

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| <b>PTA / PIA Name:</b> | CDC - OCIO ISB INFR SVCS - Background Investigations System - QTR1 - 2026 - CDC8840197 | <b>PTA / PIA ID:</b>      | 4428209                          |
| <b>Component Name:</b> | CDC - OCIO ISB Infrastructure Services                                                 | <b>ATO Boundary Name:</b> | OCIO ISB Infrastructure Services |
| <b>Office:</b>         |                                                                                        | <b>OpDiv:</b>             | CDC                              |
| <b>General 01:</b>     | Identify the Enterprise Performance Lifecycle Phase of the system.                     |                           | Operations and Maintenance       |
| <b>General 02:</b>     | Is this a FISMA-Reportable system?                                                     |                           | Yes                              |
| <b>General 03:</b>     | Does the system have or is it covered by a Security Authorization to Operate (ATO)?    |                           | Yes                              |
| <b>General 04:</b>     | ATO Date or Planned ATO Date.                                                          |                           |                                  |
| <b>General 05:</b>     | Is the system or electronic information collection, agency or contractor operated?     |                           | Agency                           |

**Privacy Threshold Analysis**

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| <b>PTA 02:</b> | Indicate the following reason(s) for this PTA. Choose from the following options.                                                                                              | PIA Validation (PIA Refresh) |
| <b>PTA 03:</b> | Is the data contained in the system owned by the agency or contractor?                                                                                                         | Agency                       |
| <b>PTA 04:</b> | Please give a brief overview of the purpose of the system by describing what the functions of the system are and how the system carries out those functions in support of HHS. |                              |

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|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                                                                                                                                                                                                      | <p>This system uses PII from People Processing (individual's name, last four of SSN, and date of birth) to record information received from the National Agency Check with Written Inquiries (NACI) or security clearance investigations processed in order for the individual to meet CDC policy for physical and logical access to CDC facilities and networks. The last four digits of the user SSN are truncated from the source database and displayed only to that user. The system uses Active Directory for authentication.</p> <p>The change described in PTA2 is currently under development and has not been deployed to a Production environment. The purpose of the soon-to be released change is to improved application efficiency and the user experience of the old legacy application.</p>                                                                 |
| <b>PTA 05:</b>  | List and/or describe all the types of information that are collected, maintained, and/or shared by the system regardless of whether that information is PII and how long that information is stored. | <p>This system uses Personal Identifiable Information (PII) from Navigator (individual's name, last four of SSN, and date of birth) to record information received from the National Agency Check with Written Inquiries (NACI) or security clearance investigations processed in order for the individual to meet CDC policy for physical and logical access to CDC facilities and networks. The last four digits of the user SSN are truncated from the source database and displayed only to that user. The system uses Active Directory for authentication, which does not require UserIDs and passwords.</p> <p>A full list of the PII collected include:</p> <p>Social Security Number</p> <p>Date of Birth</p> <p>Name</p> <p>Email Address</p> <p>Biometric Identifiers</p> <p>Education Records</p> <p>Foreign Activities</p> <p>Security clearance information</p> |
| <b>PTA 05A:</b> | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>PTA 05C:</b> | Please identify the system that maintains the user credentials or controls access to this system.                                                                                                    | The system providing credentials Navigator is a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

CDC internal application that may only be accessed by locally authenticated organizational users. The system's authentication utilizes the CDC network's Active Directory (AD); Active Directory is a separate system covered by a separate PIA.

**PTA 06:**

Describe why each type of information is collected, maintained, and/or shared by the system. Specify what information is collected about each category of individual.

Background Investigations System (BGIS) is the repository for security and suitability background investigation information for all CDC staff. This data

is used by other onboarding systems to clear individuals for physical and logical access. BGIS data is only modified by Office of Safety, Security and Asset Management (OSSAM) personnel. OSSAM grants a read only role to a small subset of staff from CDC centers.

When a person is brought on board, a new user profile is created in Navigator and that is provided to BGIS. Within BGIS, OSSAM records the processing of National Agency Check with Inquiries (NACI) and/or security clearance information, including Biometric Identifier (fingerprint clearance), employee paperwork submissions, and the completion of the investigation.

Personal Identifiable Information (PII) will be pulled from Navigator (individual's name, last four of SSN, and date of birth) and is used within the BGIS system. Once the SSN is retrieved from Navigator, only the last four digits of the SSN are displayed.

The ability to access and see the SSNs (last four) is limited to OSSAM personnel who verify information to process background investigations, issue smart cards and other facility badges, submit, request, and approve access to Office of Financial Resources/Information Technology (OFR/IT) systems, and allow access to designated Sensitive Compartmented Information Facilities (SCIF).

Although SSNs are displayed within the application, it is not stored inside of the BGIS database. The data tracked in BGIS is available in a view to CDC Global Travel System for clearance data and Security Awareness Training (SAT) to determine if additional training is required per their clearance level. Email address is collected to communicate background investigation information. Foreign activities is collected to evaluate security risks and potential foreign influence or coercion. Education information is used to verify the possession of the necessary qualifications for a position. BGIS contains PII to include SSNs.

A full list of the PII collected include:

Social Security Number

Date of Birth

Name

Email Address

Biometric Identifiers

Education Records

Foreign Activities

Security clearance information

|         |                                                          |
|---------|----------------------------------------------------------|
| PTA 07: | Does the system collect, maintain, use, or share PII?    |
| PTA 08: | Does the system include a website or online application? |

Yes  
Yes

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| <b>PTA 08A:</b> | Provide the URL(s).                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                 |                                                                                                                                                                            | <a href="https://bgis.cdc.gov">https://bgis.cdc.gov</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>PTA 08B:</b> | Are any of the website or online applications accessible by the public (including publicly accessible log in pages)?                                                       | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>PTA 09:</b>  | Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response. | <p>Background Investigations System (BGIS) is a web-based application (<a href="https://bgis.cdc.gov">https://bgis.cdc.gov</a>) designed to provide an interactive web interface allowing Office of Safety, Security and Asset Management (OSSAM) personnel to update and manage the security and suitability background investigation information for Federal employees, contractors, and affiliates. OSSAM consolidates information from completed National Agency Check with Written Inquiries (NACI) and security clearance data.</p> <p>There are multiple role levels to delineate authorization that are maintained by the Role Based Access Control (RBAC) system. BGIS is the repository for security and suitability background investigation information for all CDC staff. This data is used by other onboarding systems to clear individuals for physical and logical access. As all CDC employees are required to have a certain level of clearance, it is important that OSSAM manage this data in an accurate and efficient manner. BGIS data is only modified by OSSAM personnel. OSSAM grants a read only role to a small subset of staff from CDC center</p> |
| <b>PTA 10:</b>  | Does the website have a posted privacy notice?                                                                                                                             | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>PTA 11:</b>  | Does the website contain links to non-federal government websites external to HHS?                                                                                         | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>PTA 12:</b>  | Does the website use web measurement and customization technology?                                                                                                         | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>PTA 13:</b>  | Does the website have any information or pages directed at children under the age of thirteen?                                                                             | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>PTA 14:</b>  | Does the system have a mobile application?                                                                                                                                 | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>PTA 20:</b>  | Are any third-party websites or applications (TPWA) associated with the system?                                                                                            | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>PTA 21:</b>  | Does this system use artificial intelligence (AI) tools or technologies?                                                                                                   | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

### Privacy Impact Assessment

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|----------------|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| <b>PIA 22:</b> | Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share. | Identifying Numbers<br>Social Security Number<br>Biographical Information |
|----------------|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|

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|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                                                                                                                                                           | Name<br>Date of Birth<br>Education Records<br>Foreign Activities<br>Contact Information<br>Email Address (Business)<br>Biometrics/Distinguishing Features<br>Biometric Identifiers (e.g., fingerprints, retina scans, DNA samples)<br>Other<br>Other<br>Security clearance information                                                                                              |
| <b>PIA 22A:</b> | Identify the “other” type(s) of personally identifiable information (PII) not mentioned in the above list.                                                |                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>PIA 23:</b>  | Indicate the categories of individuals about whom PII is collected, maintained, or shared.                                                                | Business Partners/Contacts (Federal state, local agencies)<br>Employees/HHS Direct Contractors<br>Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)                                                                                                                                                                                         |
| <b>PIA 24:</b>  | Indicate the approximate number of individuals whose PII is maintained in the system.                                                                     | 10,000 – 49,999                                                                                                                                                                                                                                                                                                                                                                     |
| <b>PIA 25:</b>  | For what primary purpose is the PII used?                                                                                                                 | BGIS uses PII to record information received from the National Agency Check with Written Inquiries (NACI) or security clearance investigations processed in order for the individual to meet CDC policy for physical and logical access to CDC facilities and networks                                                                                                              |
| <b>PIA 26:</b>  | Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).                                                        | None                                                                                                                                                                                                                                                                                                                                                                                |
| <b>PIA 27:</b>  | Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID. If the Taxpayer IDs collected are only for businesses include that in your response. | This system uses the individuals last four of SSN to gather and to record information received from NACI or security clearance investigations processed in order for the individual to meet CDC policy for physical and logical access to CDC facilities and networks. The last four digits of the user SSN are truncated from the source database and displayed only to that user. |
| <b>PIA 27A:</b> | Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID. If the Taxpayer IDs collected are only for businesses, you may respond N/A.   | Executive Order 9397, as amended November 18, 2008                                                                                                                                                                                                                                                                                                                                  |
| <b>PIA 28:</b>  | Identify legal authorities, governing information use and disclosure specific to the system and program.                                                  | Executive Orders 10561 and 9397, as amended November 18, 2008                                                                                                                                                                                                                                                                                                                       |
| <b>PIA 29:</b>  | Are records in the system retrieved by one or more PII data                                                                                               | Yes                                                                                                                                                                                                                                                                                                                                                                                 |

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|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 | elements?                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>PIA 29A:</b> | Please specify which PII data elements are used to retrieve records.                                                                                                                                                                                                                                                   | SSN<br><br>Name                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>PIA 29B:</b> | 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.                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>PIA 30:</b>  | Identify the sources of PII in the system.                                                                                                                                                                                                                                                                             | Government Sources<br><br>Within the OPDIV                                                                                                                                                                                                                                                                                                                                                                              |
| <b>PIA 31:</b>  | Is there an Office of Management and Budget (OMB) information collection approval number?                                                                                                                                                                                                                              | No                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>PIA 31B:</b> | Explain why an OMB information collection approval number is not required.                                                                                                                                                                                                                                             | This system does not collect information from the public.                                                                                                                                                                                                                                                                                                                                                               |
| <b>PIA 32:</b>  | Is the PII in the system shared directly with other organizations outside the system's Operating Division?                                                                                                                                                                                                             | No                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>PIA 33:</b>  | Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?                                                                                                                                                                                                                          | Voluntary                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>PIA 34:</b>  | Describe the method in place to notify and obtain consent from individuals whose PII will be collected. If no prior notice is given or consent cannot be obtained, explain why.                                                                                                                                        | The PII is collected as part of the individual's in-processing with the CDC, stored in a common database, and is accessed by BGIS. The process for notification, consent, and collection is outside the scope of this application.                                                                                                                                                                                      |
| <b>PIA 35:</b>  | Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of original collection). If they cannot be notified or have their consent obtained, explain why. | During a major system change, the system includes functionality where an email will be generated and sent to all email addresses within the database stating the change to the system, or any change in the use of PII within the system. This system is currently not enabled. Any changes to use, purpose and information collection will also be noted in the privacy notice and will be highlighted on the website. |
| <b>PIA 36:</b>  | 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.                                                                                             | Individuals may contact the Application Services Branch (ASB) Help-desk if they believe their PII has been inappropriately obtained. Individuals can contact the Help Desk via phone in the 'Help' section of Navigator. Help-desk phone number is 404-639-6000.                                                                                                                                                        |
| <b>PIA 37:</b>  | Describe the process in place for periodic reviews of the system to ensure the integrity, availability, accuracy, and relevancy of the PII in the system. Please address each element in your response. If no processes are in place, explain why not.                                                                 | OSSAM staff will review the data at a minimum of every year (365) days. Additionally, OSSAM will review the PII data for integrity and accuracy, etc.                                                                                                                                                                                                                                                                   |

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|                |                                                                                                                                                                                                                                                                             | Identification information is verified at point of employment.                                                                                                                                                                                                                                       |
| <b>PIA 38:</b> | Identify who will have access to the PII in the system.                                                                                                                                                                                                                     | Users<br>Administrators<br>Developers                                                                                                                                                                                                                                                                |
| <b>PIA 39:</b> | Provide the reason why each of the groups identified in 38 needs access to PII.                                                                                                                                                                                             | Users - Record clearance information for record.<br><br>Administrator - Modify, reactivate, or delete clearance information for record.<br><br>Developer -Support application development and resolve issues.                                                                                        |
| <b>PIA 40:</b> | Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.                                                                                                                             | BGIS uses the Role-Based Access Control (RBAC) system to restrict a user's ability to view PII to only that level required to perform their job function. The roles are assigned by supervisors in OSSAM and implemented by the Application Services Branch (ASB) help desk in the RBAC application. |
| <b>PIA 41:</b> | Describe the technical methods in place to allow those with access to PII to access only the minimum amount of information necessary to perform their job.                                                                                                                  | BGIS uses RBAC to restrict a user's ability to view PII to only that required to perform their job function. The roles are assigned by supervisors in OSSAM and implemented by the MISO help desk in the RBAC application authorization server. The least privilege model is utilized.               |
| <b>PIA 42:</b> | Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) to make them aware of their responsibilities for protecting the information being collected and maintained. | Users must undergo annual security awareness training to maintain their CDC network account and access to BGIS.                                                                                                                                                                                      |
| <b>PIA 43:</b> | Describe the training system users receive above and beyond general security and privacy awareness training.                                                                                                                                                                | None                                                                                                                                                                                                                                                                                                 |
| <b>PIA 44:</b> | Describe the process and guidelines in place for the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).                                                 | GENERAL RECORDS<br>SCHEDULE 5.2:                                                                                                                                                                                |

Transitory and  
Intermediary Records

The PII is secured using the CDC Active Directory authentication process and RBAC behind the CDC firewalls.

Temporary. Destroy upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later.

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

PIA  
45:

**PIA 45:** Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.

Administrative: Records are maintained according with CDC’s record control schedule and record control policy. GENERAL RECORDS SCHEDULE 5.2: Transitory and Intermediary Records. The PII is secured using the CDC Active Directory authentication process and RBAC.

Technical: Monitored by the Network and IT security controls which is administered by Office of the Chief Information Security Officer (OCISO) and Technology Services Branch (TSB). Information is exchanged with Health and Human Services (HHS) across an encrypted Secure File Transfer Protocol (SFTP) connection.

Physical: Controls are managed by onsite security guards, ID badges and key card restrictions.