Privacy Impact Assessment (PIA): CDC - ID ELIMS - QTR4 - 2023 - CDC7049965

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Instructions

Review the following steps to complete this questionnaire:

1) Answer questions. Select the appropriate answer to each question. Question specific help text may be available via the icon. If your answer dictates an explanation, a required text box will become available for you to add further information.

2) Add Comments. You may add question specific comments or attach supporting evidence for your answers by clicking on the icon next to each question. Once you have saved the comment, the icon will change to the icon to show that a comment has been added.

3) Change the Status. You may keep the questionnaire in the "In Process" status until you are ready to submit it for review. When you have completed the assessment, change the Submission Status to "Submitted". This will route the assessment to the proper reviewer. Please note that all values list questions must be answered before submitting the questionnaire.

4) Save/Exit the Questionnaire. You may use any of the four buttons at the top and bottom of the screen to save or exit the questionnaire. The button allows you to complete the questionnaire. The button allows you to save your work and close the questionnaire. The button allows you to save your work and remain in the questionnaire. The button closes the questionnaire without saving your work.

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

General Information

PIA Name:	CDC - ID ELIMS - QTR4 - 2023 - CDC7049965	**PIA ID:**	1722459
Name of Component:	CDC - OID Infectious Diseases Enterprise LIMS	**Name of ATO Boundary:**	OID Infectious Diseases Enterprise LIMS
Overall Status:		**PIA Queue:**	
Submitter:		**# Days Open:**	86
Submission Status:	Re-Submitted	**Submit Date:**	1/3/2024
Next Assessment Date:	01/09/2027	**Expiration Date:**	1/9/2027
Office:		**OPDIV:**	CDC
Security Categorization:	Moderate	**OpDiv PIA ID:**	CDC7049965
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.	12/18/2023
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.	The systems Infectious Diseases Enterprise Laboratory Information Management System Web Portal (ID ELIMS WP) and Infectious Diseases Enterprise Laboratory Information Management System Health Level Seven (ID ELIMS HL7) have been consolidated into the system
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.	ID ELIMS is the National Center for Emerging and Zoonotic Infectious Disease (NCEZID) implementation of an enterprise-level Laboratory Information Management System (LIMS) at CDC. ID ELIMS comprises of a platform of integrated components that support specimen tracking, data management, and interoperability between CDC, State Public Health Laboratories (SPHL), and other external health submitters. The ID ELIMS Platform is comprised of eight (8) components. They include: 1.) STARLIMS -Is an enterprise-level laboratory information

		management system (LIMS) used by CDC laboratories for specimen management, testing and reporting activities. -STARLIMS processes specimen test order requests from external submitter organizations such as state public health laboratories, hospitals, commercial labs, and other federal institutions. As specimens are processed through testing in the respective laboratories, results and interpretation data are entered into STARLIMS, approved by a laboratory supervisor, and then released as a specimen final report back to the submitter organization. 2.) ELIMS Linked Laboratory Assistant (ELLA) -Is a mobile .NET web application designed for use with tablets and notebook computers in CDC laboratories. -ELLA utilizes web services via connection to the ELIMS Web Service Hub to allow retrieval of real-time data without leaving the physical laboratory space. It processes specimen testing data related to test configuration, test runs, control conditions, associated drugs, extracts, results, inventory, and lab worksheets. 3.) Test Directory (TD) Change Request System -Is a web-based, internal application used by CDC users to submit, receive, review, modify, and approve change requests for Test Order data within the CDC Infectious Diseases Laboratory Test Directory. -Test Directory change requests are submitted by CDC laboratory users who require informational changes made to test orders that are aligned to their respective laboratory in the CDC ID Laboratory Test Directory. The CDC Test Directory is subsequently referenced by external submitters when they submit specimens to a CDC laboratory for testing. 4) CDC Specimen Submission Form 50.34 -The CDC Specimen Submission Form 50.34 is a printable PDF document that accompanies specimen shipments to CDC for laboratory testing. The 50.34 Form is used to communicate detailed information to CDC laboratories regarding a specimen submitted for testing. -The form's data includes origin of the specimen, test order requested, specimen data, patient data, submitter data and epidemiological information. 5.) CDC Specimen Test Order and Reporting (CSTOR) Web Portal -Is a web application for external health laboratories (public and private) to submit specimen samples to CDC for testing. The application offers the ability to request sample testing, submit sample data, print shipping manifests, track receipt status, and receive digital test results reports.
PTA - 5:	List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.	The ID ELIMS Platform is comprised of eight (8) components. Each component data information type includes: 1.) STARLIMS Specimens, patients, submitters, storage locations,

inventory, cases, events, tests, results, and specimen test reports. Data collected is from various populations from around the world. The system includes PII data such as patient name, patient date of birth, patient identification number, patient sex, and patient medical information.

2.) ELIMS Linked Laboratory Assistant (ELLA)
ELLA processes specimen testing data related to test configuration, test runs, control conditions, associated drugs, extracts, results, inventory, and lab worksheets. ELLA does not contain PII data

3.) Test Directory (TD) Change Request System

TD collects the following data: Test order name, pre-approval information, supplemental information, specimen origin, acceptable sample/specimen type for testing, minimum volume required, collection, storage and preservation of specimen prior to shipping, transport medium, specimen labeling, shipping instructions and specimen handling requirements, turnaround time, interferences and limitations, and CDC points of contact. TD also receives and retains business-level PII information for CDC staff accessing the system including last name, first name, business email, and business phone number

4) CDC Specimen Submission Form 50.34

Collects origin of the specimen (human, animal, food, environmental, medical device or biologic), CDC test order name/code, specimen information, patient information (as applicable), animal information (as applicable) information about the submitting organization requesting the testing, patient history (as applicable), owner information and animal history (as applicable) and epidemiological information. The form contains PII data related to the following fields on the form: patient name, patient date of birth, patient sex, patient age, patient race, patient identification number, patient medical notes, submitter point of contact name, submitter point of contact email, and submitter point of contact phone number.

5.) CDC Specimen Test Order and Reporting (CSTOR) Web Portal

CSTOR Web Portal collects specimen metadata, shipping package information, patient name, patient date of birth, patient sex, patient age, patient race, patient identification number, patient medical notes, submitter organization name, submitter point of contact name, submitter point of contact email, and submitter point of contact phone number. This data is used to associate a specimen with a particular patient. PII is collected for a specimen test order request in some cases

		but not always. This data is retained in the STARLIMS ATL and FTC databases. 6.) ELIMS Web Service Hub Component collects specimen metadata, patient metadata, submitter metadata, events, cases, test orders, work sheets, inventory, controls, tests, results, and reporting data. 7.) ELIMS Interoperability/HL7 Messaging Collects specimens, patients, submitters, storage locations, inventory, cases, events, tests, results, and specimen test reports. Data collected is from various populations from around the world. The system includes PII data such as patient name, patient date of birth, patient identification number, patient sex, and patient medical information. 8.) ID ELIMS Data Store Collects specimens, patients, submitters, storage locations, inventory, cases, events, tests, results, and specimen test reports. Data collected is from various populations from around the world. The system includes PII data such as patient name, patient date of birth, patient identification number, patient sex, and patient medical information.
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.	ID ELIMS contains information related to specimens, patients, submitters, test orders, specimen storage locations, inventory, cases, events, tests, results, and specimen test reports. The ID ELIMS Platform is comprised of eight (8) components. They include: 1.) STARLIMS The data is used by CDC and external submitter organizations for health management of the patient population by aiding in the identification, prevention, cure, and understanding of new and existing diseases 2.) ELIMS Linked Laboratory Assistant (ELLA) ELLA is tightly integrated with ELIMS workflows and was built to replace paper processing sheets and notebooks that are used to capture data about sample and assay preparation procedures such as reagent information and when tasks are

completed. This laboratory documentation is required for quality management requirements at CDC and supports user compliance to laboratory quality controls by ensuring the data is repeatable and can be trusted.

3.) Test Directory (TD) Change Request System

TD Change Request System uses data to process change requests submitted by CDC laboratory users who require informational changes made to test orders that are aligned to their respective laboratory. The change requests are reviewed and processed by the Infectious Diseases Specimen Submission Change Control Board (IDSS CCB). The data includes approved CDC test orders and their detailed information that are referenced by external submitters when they submit specimens to CDC for testing.

4) CDC Specimen Submission Form 50.34

The collection the 50.34 Form's data is pertinent in ensuring a specimen's testing results are linked to the correct patient and the final test reports are delivered to the appropriate submitting organization to aid in making proper health-related decisions related to the patient. Furthermore, the data provided on the form may be used by the CDC to identify sources of potential outbreaks and other public-health related events.

5.) CDC Specimen Test Order and Reporting (CSTOR) Web Portal

This data is used as a formal test order request that will be processed by the applicable CDC Infectious Disease Testing laboratory. Electronic test reports are available to the external submitters in order to assist in making health care decisions related to the patient.

6.) ELIMS Web Service Hub
Data routed via the Web Service Hub is sourced from system components within the ELIMS platform as well as other CDC laboratory applications and instruments. They include STARLIMS, ClarityLIMS, BioNumerics, ELLA, and CSTOR.

7.) ELIMS Interoperability/HL7 Messaging

Data is collected and processed CDC specimen test results data for SPHL submitter organizations who are users of the AIMS Hub and who have agreed to receive this data via electronic messaging.

		8.) ID ELIMS Data Store ID ELIMS Data Store data is sourced from legacy STARLIMS v9 and current STARLIMS systems and is used for data analysis and reporting activities by CDC users.
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)?	No
PTA - 9:	Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response.	The website is used for submission of specimens from state health laboratories and partners. The users access the system via SAMS and connections are made to the system via web services.
PTA - 10:	Does the website have a posted privacy notice?	Yes
PTA - 11:	Does the website contain links to non-federal government websites external to HHS?	No
PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
PTA - 12:	Does the website use web measurement and customization technology?	No
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	
PTA - 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA - 13A:	Does the website collect PII from children under the age thirteen?	
PTA - 13B:	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PTA - 14:	Does the system have a mobile application?	No
PTA - 14A:	Is the mobile application HHS developed and managed or a third-party application?	
PTA - 15:	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
PTA - 16:	Does the mobile application/ have a privacy notice?	
PTA - 17:	Does the mobile application contain links to non-federal government websites external to HHS?	
PTA - 17A:	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
PTA - 18:	Does the mobile application use measurement and customization technology?	
PTA - 18A:	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
PTA - 19:	Does the mobile application have any information or pages directed at children under the age of thirteen?	
PTA - 19A:	Does the mobile application collect PII from children under the age thirteen?	

PTA - 19B:	Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PTA - 20:	Is there a third-party website or application (TPWA) associated with the system?	No
PTA - 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

PIA

PIA

PIA - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address Phone numbers Medical records (PHI) Date of Birth Patient ID Number Other - Free text Field - Sex, age, race.
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Business Partners/Contacts (Federal, state, local agencies) Patients
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?	PII is used only to uniquely identify specimen and patient information, which we provide back to the submitter as verification as to the correct specimen submitted and tested. The primary use of PII data in ELIMS is the State Public Health submitters can accurately match the submitted sample with the testing results performed by CDC for patient care or a public health response. For some of our laboratory testing, the types of tests that are performed, and the interpretation of these results can be impacted by the PII information that is known and collected. The PII data is provided in the laboratory reports back to the submitting Public Health Agency. In addition CDC Clinical Laboratory Improvement Amendments (CLIA) laboratories are required by regulation to collect at least 2 specific PII data elements, examples of that include patient ID, name and DOB.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	The secondary uses for which the PII includes other communications such as telephone, where CDC and the submitting Public Health Agency need to use PII information to convey additional information about a laboratory research and testing methods for a specific patient, specimen or interpretation of the results of a test.
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	N/A
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	N/A

PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	Public Health Service Act, Section 301, "Research and Investigation," (42 U.S.C. 241); and Sections 304, 306 and 308(d) which discuss authority to grant assurances of confidentiality for health research and related activities (42 U.S.C. 242 b, k, and m(d)).
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.	First name, Last name, Date of Birth, Age, business email, phone.
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.	09-20-0106 Specimen Handling for Testing and Related Data
PIA - 9:	Identify the sources of PII in the system.	Government Sources State/Local/Tribal Foreign Non-Government Sources Private Sector
PIA - 10:	Is there an Office of Management and Budget (OMB) information collection approval number?	No
PIA - 10A:	Provide the information collection approval number.	
PIA - 10B:	Identify the OMB information collection approval number expiration date.	
PIA - 10C:	Explain why an OMB information collection approval number is not required.	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.	Other Federal Agency/Agencies State or Local Agency/Agencies Within HHS
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	Within HHS: Report test results to the original submitter. Other Federal Agencies: Report test results to the original State or Local: Report test results to the original submitter.
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)).	N/A. Some PII is included in reports sent back to the original submitters. However, these organizations only receive reports on cases they originally submitted, and any PII included is information they themselves provided.

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.	Data reporting disclosures are tracked by the audit/traceability functionality provided by the ELIMS system. All other disclosures such as Freedom of Information Act (FOIA) and legal requests are tracked via a spreadsheet and must be approved in writing by the specimen owner, laboratory Team Lead, and the ELIMS Science Advisor. Processes in place for obtaining PII are controlled outside of this agency by submitters of specimen data.
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 information collected is from State and Local Public Health departments, which are mandated as reportable to the departments by local regulations. If an individual choose to opt-out they would provide that information to the State or Local Public Health Department.
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.	Patient PII data are collected by State Public Health laboratories and are submitted to CDC in support of Public Health surveillance, investigation, and intervention activities. In the event a major system change significantly alters the disclosure and/or use of PII maintained in the system, CDC will notify the State Public Health laboratories of the change so they can take appropriate action to notify and obtain consent from the affected individuals. However, notification is unlikely because the HIPAA Privacy Rule, "expressly permits disclosures without individual authorization to public health authorities authorized by law to collect or receive the information for the purpose of preventing or controlling disease, injury, or disability, including but not limited to public health surveillance, investigation, and intervention." (HIPAA Privacy Rule and Public Health Guidance from CDC and the U.S. Department of Health and Human Services, available online at http://www.cdc.gov/mmwr/preview/mmwrhtml/m2e411a1.htm)
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.	Patient PII data are collected by State Public Health laboratories and are submitted to CDC in support of Public Health surveillance, investigation, and intervention activities. CDC has no direct involvement in the PII collection process or contact with the individuals. Therefore, CDC relies upon State Public Health laboratories to have appropriate processes and procedures in place to resolve individual concerns regarding the accuracy and handling of the PII prior to submission. Concerns regarding CDC's use and disclosure of PII are handled according to CDC's PII Incident Response Standard maintained by the Cybersecurity Program Office (CSPO).

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 ELIMS-level process is in place for periodic reviews of PII for data integrity, availability, accuracy and relevancy. ELIMS provides laboratory units access to review all data including PII. As the data owners the laboratories can conduct their own reviews as needed or as consistent with their existing policies. ELIMS does not have the authority to mandate a review.
PIA - 17:	Identify who will have access to the PII in the system.	Users Administrators Developers Others
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: Users will have access for specimen data entry, analytical results entry, and reporting. Administrators: Administrators have access to PII data in ELIMS for troubleshooting, database and system management. Developers: (Limited) System functional development Others: HHS/CDC badged contractors are used on this project for maintenance and user support and may incidentally view PII data to help troubleshoot user's problems in the system.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Accessing ID ELIMS data is provided via Role based access with approval from the Business Steward (BS). Accessing PII data is limited to the technical support staff who may incidentally view PII data while assisting internal users and troubleshoot issues in ID ELIMS. Role-based system access, audit trail and traceability. Administrator have access to system management and troubleshooting; developers do (limited) system functional development; and contractors are used for project design, development, configuration, customizing and maintenance.

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.	ID ELIMS utilizes the Least Privilege Model for granting access to system data. CDC administrators create unique profiles for each user and assign users to groups and determine controls and background clearance levels associated with each user and group (e.g. User 1 associated with Lab A can only access specimen data and its PII that is associated with Lab A; User 1 will not see data associated Lab B). Specific data permissions include access rights to edit/add/delete. A user's role or group controls access to specific ELIMS modules and functionality.
PIA - 21:	Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.	All IDELIMS users receive annual Security Awareness Training.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	All IDELIMS users receive annual Role-Based Training.
PIA - 23:	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).	Final reports and substantive reporting materials are maintained permanently (CDC RCS, B-321, 2&4). Routine reports are maintained for five years (GRS 5.2, item 020). Other input/output records are disposed of when no longer needed (GRS 5.2, item 020). Disposal methods include erasing computer tapes, burning or shredding paper materials or transferring records to the Federal Records Center when no longer needed for evaluation and analysis.

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.	Physical Safeguards: Access to the CDC Clifton Road facility where the mainframe computer is located is controlled by a cardkey system. Access to the computer room is controlled by a cardkey and security code (numeric keypad) system. Access to the data entry area is also controlled by a cardkey system. The hard copy records are kept in locked cabinets in locked rooms. The local fire department is located directly next door to the Clifton Road buildings. The computer room is protected by an automatic sprinkler system, automatic sensors (e.g., water, heat, smoke, etc.) are installed, and portable fire extinguishers are located throughout the computer room. The system is backed up on a nightly basis with copies of the files stored off site in a secure fireproof safe. The 24-hour guard service in buildings provides personnel screening of visitors. Electronic anti-intrusion devices are in effect at the Federal Records Center. Administrative Safeguards: Protection for computerized records both on the mainframe and the Local Area Network (LAN) includes programmed verification of valid user identification code and password prior to logging on to the system, mandatory password changes, limited log-ins, virus protection, and user rights/file attribute restrictions. Password protection imposes user name and password log-in requirements to prevent unauthorized access. Each user name is assigned limited access rights to files and directories at varying levels to control file sharing. There is routine daily backup procedures and secure off-site storage is available for backup tapes. To avoid inadvertent data disclosure, “degaussing” is performed to ensure that all data are removed from Privacy Act computer tapes and/or other magnetic media. Additional safeguards may be built into the program by the system analyst as warranted by the sensitivity of the data. Technical Safeguards: The ID ELIMS system is behind firewalls and intrusion detection system to protect the data at rest. Encryption is in place to protect the data in transit as well as the database the data at rest.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	**Privacy Analyst Review Date:**	1/3/2024
Privacy Analyst Comments:	OpDiv Privacy Analyst: Joshua Mosios Status: Re-Approved Date: January 3, 2024	**Privacy Analyst Days Open:**	

SOP Review

SOP Review Status:	Approved	**SOP Signature:**	
SOP Comments:	Approved on behalf of Beverly Walker	**SOP Review Date:**	1/8/2024
		SOP Days Open:	5

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	**Agency Privacy Analyst Review Date:**	1/9/2024
Agency Privacy Analyst Review Comments:	Reviewer: Nestor Villafuerte All comment have been address, URL is functioning as intended. Submitting PIA for SAOP review and approval.	**Agency Privacy Analyst Days Open:**	1

SAOP Review

SAOP Review Status:	Approved	**SAOP Signature:**	Archer Signature_Bridget Guenther.docx
SAOP Comments:		**SAOP Review Date:**	1/10/2024
		SAOP Days Open:	1

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmcdc	10/17/2023	Modified answer to summarize PII data elements from PTA.	
PIA - 8A	Data Feed Service, piafrmcdc	10/17/2023	Please address.	
PIA - 14	Data Feed Service, piafrmcdc	10/17/2023	Is HIPAA implicated here? Most CDC systems are not covered by HIPAA, and in this instance would need to be cited in PIA 7 as a governing legal authority.	
PIA - 21	Data Feed Service, piafrmcdc	10/17/2023	Please provide frequency (annually)	
PIA - 22	Data Feed Service, piafrmcdc	12/5/2023	Provide more information to describe the training. How often is it provided?	
PIA - 23	Data Feed Service, piafrmcdc	12/5/2023	The GRS has been updated and 20.6 is no longer in use. Please update.	
PIA - 14	VILLAFUERTE, NESTOR	1/9/2024	The URL provided leads to a page that no longer exists. Please verify and update accordingly.	
PIA - 1	Data Feed Service, piafrmcdc	9/30/2024	This System has been migrated within the OCIO ISB Infrastructure Services authorization boundary. All future updates should be made via the new Sub- Component application.	

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:	9/30/2024 8:01 PM	**History Log:**	View History Log