




## Copy PIA (Privacy Impact Assessment)

Do you want to copy this PIA ?

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

## Instructions


Review the following steps to complete this questionnaire:

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

### Acronyms

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

## General Information

|                                 |   |                                       |                            |
|---------------------------------|---|---------------------------------------|----------------------------|
| <b>PIA Name:</b>                | CDC - PLS - QTR1 - 2023 - CDC6707791  | <b>PIA ID:</b>                        | 1642745                    |
| <b>Name of Component:</b>       | CDC - Plain Language System   | <b>Name of ATO Boundary:</b>          | Plain Language System      |
| <b>Overall Status:</b>          |    | <b>PIA Queue:</b>                     |                            |
| <b>Submitter:</b>               |   | <b># Days Open:</b>                   | 367                        |
| <b>Submission Status:</b>       | Submitted   | <b>Submit Date:</b>                   | 3/6/2024                   |
| <b>Next Assessment Date:</b>    | N/A   | <b>Expiration Date:</b>               | 1/1/2100                   |
| <b>Office:</b>                  |   | <b>OPDIV:</b>                         | CDC                        |
| <b>Security Categorization:</b> | Low   | <b>OpDiv PIA ID:</b>                  | CDC6707791                 |
| <b>Legacy PIA ID:</b>           |   | <b>Make PIA available to Public?:</b> | Yes                        |
| <b>1:</b>                       | Identify the Enterprise Performance Lifecycle Phase of the system.                  |                                       | Operations and Maintenance |
| <b>2:</b>                       | Is this a FISMA-Reportable system?  |                                       | Yes                        |
| <b>3:</b>                       | Does the system have or is it covered by a Security Authorization to Operate (ATO)? |                                       | Yes                        |
| <b>4:</b>                       | ATO Date or Planned ATO Date.   |                                       | 4/8/2024                   |
| <b>5:</b>                       | Is the system or electronic information collection, agency or contractor operated?  |                                       | Agency                     |

## PTA

|                  |   |   |
|------------------|---|---|
| <b>PTA</b>       |   |   |
| <b>PTA - 2:</b>  | Indicate the following reason(s) for this PTA. Choose from the following options.   | PIA Validation (PIA Refresh)  |
| <b>PTA - 2A:</b> | Describe in further detail any changes to the system that have occurred since the last PIA.   | None  |
| <b>PTA - 3:</b>  | Is the data contained in the system owned by the agency or contractor?  | Agency  |
| <b>PTA - 4:</b>  | 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>The Plain Language System (PLS) is an internal only tool used to analyze documents (Word, PDF, text) for complex, jargon-laden copy to improve the use of plain language in CDC communications.</p> <p>The Tool scores content to improve writing quality for grammar and readability. The tool provides a plain language score for documents and complex sentences. Which help to do the required modification to meet the needs of The Plain Writing Act of 2010 which requires federal agencies to write "clear government communication that the public can understand and use." The system will allow CDC Chief Information Officers (CIOs) to publish sites and distribute documents in plain language that will help the public understand the topic without technical jargons and phrases.</p> |

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| <b>PTA - 5:</b>  | 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 system stores and collects email addresses of internal CDC employees (CDC email only).</p> <p>The license to the users is maintained in this user table of the tool using the email address till as long as the user is deleted from the tool user list.</p> <p>The documents are not stored it is analyzed and generates report.</p> <p>Non PII stored are<br/> How many Active\ Inactive users in the system<br/> How many Text \ Docs \ URL analyzed. How many watch words were used in the document analyzed<br/> Quality scores for content analyzed like grade level, long sentences, readability, passive voice.</p> <p>The Tool scores content to improve writing quality for grammar and readability. The Tool provides a plain language score for documents and complex sentences. Which help to do the required modification to meet the needs of The Plain Writing Act of 2010 which requires federal agencies to write “clear government communication that the public can understand and use.” The system will allow CDC Chief Information Officers (CIOs) to publish sites and distribute documents in plain language that will help the public understand the topic without technical jargons and phrases.</p> |
| <b>PTA - 5A:</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. The system providing credentials is   |
| <b>PTA - 5B:</b> | Please identify the type of user credentials used to access the system.   |   |

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| <b>PTA - 6:</b>  | Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual. | <p>The system stores and collects email address of internal CDC (CDC email only). Internal CDC users and direct contractors access the system via network credentials stored in Active Directory and using their CDC issued Personal Identification and Verification (PIV) Card.</p> <p>The system stores and collects email address of internal CDC employees (CDC email only) for authentication and providing access to Internal CDC users and direct contractors access the system.</p> <p>Below Non PII stored and collected to display report<br/> How many Active\ Inactive users in the system<br/> How many Text \ Docs \ URL analyzed. How many watch words were used in the document analyzed<br/> Quality scores for content analyzed like grade level, long sentences, readability, passive voice.</p> <p>The Tool scores content to improve writing quality for grammar and readability. The Tool provides a plain language score for documents and complex sentences. Which help to do the required modification to meet the needs of The Plain Writing Act of 2010 which requires federal agencies to write "clear government communication that the public can understand and use." The system will allow CDC Chief Information Officers (CIOs) to publish sites and distribute documents in plain language that will help the public understand the topic without technical jargons and phrases.</p> |
| <b>PTA - 7:</b>  | Does the system collect, maintain, use or share PII?   | Yes  |
| <b>PTA - 7A:</b> | Does this include Sensitive PII as defined by HHS?   | No   |
| <b>PTA - 8:</b>  | Does the system include a website or online application?   | Yes  |
| <b>PTA - 8A:</b> | Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?   | No   |
| <b>PTA - 9:</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>The Plain Language System (PLS) is an internal only tool used to analyze documents (Word, PDF, text) for complex, jargon-laden copy to improve the use of plain language in CDC communications.</p> <p>The Tool scores content to improve writing quality for grammar and readability. The Tool provides a plain language score for documents and complex sentences. Which help to do the required modification to meet the needs of The Plain Writing Act of 2010 which requires federal agencies to write "clear government communication that the public can understand and use." The system will allow CDC Chief Information Officers (CIOs) to publish sites and distribute documents in plain language that will help the public understand the topic without technical jargons and phrases.</p>  |

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| <b>PTA - 10:</b>  | Does the website have a posted privacy notice?   | No |
| <b>PTA - 11:</b>  | Does the website contain links to non-federal government websites external to HHS?   | No |
| <b>PTA - 11A:</b> | Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?  |    |
| <b>PTA - 12:</b>  | Does the website use web measurement and customization technology?   | No |
| <b>PTA - 12A:</b> | Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.  |    |
| <b>PTA - 13:</b>  | Does the website have any information or pages directed at children under the age of thirteen?   | No |
| <b>PTA - 13A:</b> | Does the website collect PII from children under the age thirteen?   |    |
| <b>PTA - 13B:</b> | 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?            |    |
| <b>PTA - 14:</b>  | Does the system have a mobile application?   | No |
| <b>PTA - 14A:</b> | Is the mobile application HHS developed and managed or a third-party application?  |    |
| <b>PTA - 15:</b>  | Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.                                       |    |
| <b>PTA - 16:</b>  | Does the mobile application/ have a privacy notice?  |    |
| <b>PTA - 17:</b>  | Does the mobile application contain links to non-federal government websites external to HHS?  |    |
| <b>PTA - 17A:</b> | Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?   |    |
| <b>PTA - 18:</b>  | Does the mobile application use measurement and customization technology?  |    |
| <b>PTA - 18A:</b> | Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.   |    |
| <b>PTA - 19:</b>  | Does the mobile application have any information or pages directed at children under the age of thirteen?  |    |
| <b>PTA - 19A:</b> | Does the mobile application collect PII from children under the age thirteen?  |    |
| <b>PTA - 19B:</b> | 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? |    |
| <b>PTA - 20:</b>  | Is there a third-party website or application (TPWA) associated with the system?   | No |
| <b>PTA - 21:</b>  | Does this system use artificial intelligence (AI) tools or technologies?   | No |

### PIA

#### PIA

|                 |   |  |
|-----------------|---|--|
| <b>PIA - 1:</b> | Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share. | Email Address                                    |
| <b>PIA - 2:</b> | Indicate the categories of individuals about whom PII is collected, maintained or shared.                           | Employees/ HHS Direct Contractors                |
| <b>PIA - 3:</b> | Indicate the approximate number of individuals whose PII is maintained in the system.                               | 51 - 200   |
| <b>PIA - 4:</b> | For what primary purpose is the PII used?   | Used to authenticate users to access the system. |

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| <b>PIA - 5:</b>   | Describe any secondary uses for which the PII will be used (e.g. testing, training or research).   | Reporting  |
| <b>PIA - 6:</b>   | Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.   | NA   |
| <b>PIA - 6A:</b>  | Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.  | NA   |
| <b>PIA - 7:</b>   | Identify legal authorities governing information use and disclosure specific to the system and program.  | Title 5 USC Section 301  |
| <b>PIA - 8:</b>   | Are records in the system retrieved by one or more PII data elements?  | No   |
| <b>PIA - 8A:</b>  | Please specify which PII data elements are used to retrieve records.   |  |
| <b>PIA - 8B:</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 - 9:</b>   | Identify the sources of PII in the system.   | Directly from an individual about whom the information pertains<br>Email<br>Government Sources<br>Within the OPDIV   |
| <b>PIA - 10:</b>  | Is there an Office of Management and Budget (OMB) information collection approval number?  | No   |
| <b>PIA - 10A:</b> | Provide the information collection approval number.  |  |
| <b>PIA - 10B:</b> | Identify the OMB information collection approval number expiration date.   |  |
| <b>PIA - 10C:</b> | Explain why an OMB information collection approval number is not required.   | If you're only collecting information from federal employees or military personnel as part of their job, then you don't need PRA clearance/OMB information collection approval number.   |
| <b>PIA - 11:</b>  | Is the PII shared with other organizations outside the system's Operating Division?  | No   |
| <b>PIA - 11A:</b> | Identify with whom the PII is shared or disclosed.   |  |
| <b>PIA - 11B:</b> | Please provide the purpose(s) for the disclosures described in PIA - 11A.  |  |
| <b>PIA - 11C:</b> | 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)).   |  |
| <b>PIA - 11D:</b> | 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.  |  |
| <b>PIA - 12:</b>  | Is the submission of PII by individuals voluntary or mandatory?  | Voluntary  |
| <b>PIA - 12A:</b> | If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.   |  |
| <b>PIA - 13:</b>  | 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.  | Users may not "opt-out" of providing their PII. Without PII, Users will not be able to access these services.  |
| <b>PIA - 14:</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). Alternatively, describe why they cannot be notified or have their consent obtained. | Users are notified at the time of sign up, with a message on the website, that their personal information will be collected. Upon signing up users are prompted with the personal identifying information (PII) fields that need to be filled in for registration. |

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| <b>PIA - 15:</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 that believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate can contact support ticket staff at IMTech@cdc.gov.   |
| <b>PIA - 16:</b>  | 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.   | CDC Branch Chiefs, in conjunction with the business steward, define the process for periodic reviews. Administrators direct contractors perform annual reviews of the PII, in order to ensure the data's integrity, availability, accuracy, and relevancy. If there has been no activity from the account for a year, then the account is removed.      |
| <b>PIA - 17:</b>  | Identify who will have access to the PII in the system.  | Users<br>Administrators<br>Contractors  |
| <b>PIA - 17A:</b> | Select the type of contractor.   | HHS/OpDiv Direct Contractors  |
| <b>PIA - 17B:</b> | Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?  | Yes   |
| <b>PIA - 18:</b>  | Provide the reason why each of the groups identified in PIA - 17 needs access to PII.  | User - Users have access to authenticate.<br>Administrators - To maintain users.<br>CTRs - To authenticate and maintain users.  |
| <b>PIA - 19:</b>  | Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.  | Access to system will only be granted to the Business Steward, using a least privileged model, with role-based access controls  |
| <b>PIA - 20:</b>  | 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.   | Each individual administrator will only have access to their own unique credentials. All users must be approved by the Business Steward based on their role, duties and responsibilities prior to gaining access to the data. Role Based Access Control (RBAC) is utilized. The roles are predefined and users are assigned those roles as appropriate. |
| <b>PIA - 21:</b>  | 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 CDC Personnel are required to take annual CDC Security and Privacy Awareness Training.  |
| <b>PIA - 22:</b>  | Describe the training system users receive (above and beyond general security and privacy awareness training).   | none  |
| <b>PIA - 23:</b>  | 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).   | PLS reviews, archives, or destroys material in accordance with the Records Management Policy; Electronic Database records are maintained for a period of two years - CDC-01-1-08. These records are deleted from the system file folders on the servers they sit on.  |

**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: Users who manage the system complete annual CDC Security and Awareness Training (SAT), which includes how PII should be handled and secured at CDC.

Technical controls: The system implements CDC recommended technical controls including user authentication and authorization, network firewalls, network intrusion detection, data encryption, and application access controls.

Physical controls: Physical controls include security guards, identification badges, key cards, and closed circuit TV. The information is stored in secure database hosted at a secure location.

## Review & Comments

### Privacy Analyst Review

|   |   |                                     |          |
|---|---|-------------------------------------|----------|
| <b>OpDiv Privacy Analyst Review Status:</b> | Approved  | <b>Privacy Analyst Review Date:</b> | 3/7/2024 |
| <b>Privacy Analyst Comments:</b>            | OpDiv Privacy Analyst: Joshua Mosios<br>Status: Approved<br>Date: March 7, 2024 | <b>Privacy Analyst Days Open:</b>   |          |

### SOP Review

|                           |                                      |                         |           |
|---------------------------|--------------------------------------|-------------------------|-----------|
| <b>SOP Review Status:</b> | Approved                             | <b>SOP Signature:</b>   |           |
| <b>SOP Comments:</b>      | Approved on behalf of Beverly Walker | <b>SOP Review Date:</b> | 3/18/2024 |
|                           |                                      | <b>SOP Days Open:</b>   | 12        |

### Agency Privacy Analyst Review

|  |  |  |           |
|--|--|--|-----------|
| <b>Agency Privacy Analyst Review Status:</b>   | Approved   | <b>Agency Privacy Analyst Review Date:</b> | 3/20/2024 |
| <b>Agency Privacy Analyst Review Comments:</b> | Reviewer: Jim Laskowski<br>3/20/2024 This PIA is ready for SAOP review and approval. | <b>Agency Privacy Analyst Days Open:</b>   | 2         |

### SAOP Review

|                            |          |                          |  |
|----------------------------|----------|--------------------------|--|
| <b>SAOP Review Status:</b> | Approved | <b>SAOP Signature:</b>   | Archer Signature_Bridget Guenther.docx |
| <b>SAOP Comments:</b>      |          | <b>SAOP Review Date:</b> | 3/22/2024                              |
|                            |          | <b>SAOP Days Open:</b>   | 2                                      |

### Supporting Document(s)

| Name             | Size | Type | Upload Date | Downloads |
|------------------|------|------|-------------|-----------|
| No Records Found |      |      |             |           |

### Comments

| Question Name | Submitter                     | Date      | Comment   | Attachment |
|---------------|-------------------------------|-----------|---|------------|
| PIA - 1       | Data Feed Service, piafrmc dc | 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 Agency Privacy Analyst Approve?: 1

Is SAOP Approved?: 1

Total Approved: 4

Total Approval Required: 4

Is OpDiv Privacy Analyst Return?: 0

Is SOP Return?: 0

Is Agency Privacy Analyst Return?: 0

Is SAOP Return?: 0

Total Return: 0

### Miscellaneous Fields

Last Updated: 9/30/2024 8:01 PM

History Log: [View History Log](#)