

Copy PIA (Privacy Impact Assessment)

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

Instructions


Review the following steps to complete this questionnaire:

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

Acronyms

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

General Information

PIA Name:	CDC - TRACI - QTR4 - 2024 - CDC8554182	PIA ID:	2411506
Name of Component:	CDC - Travel Risk Assessment, Accountability, Clearance and Incident Reporting	Name of ATO Boundary:	Travel Risk Assessment, Accountability, Clearance and Incident Reporting
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	97
Submission Status:	Re-Submitted	Submit Date:	12/18/2024
Next Assessment Date:	N/A	Expiration Date:	1/1/2100
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC8554182
Legacy PIA ID:		Make PIA available to Public?:	Yes
1:	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
2:	Is this a FISMA-Reportable system?		Yes
3:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
4:	ATO Date or Planned ATO Date.		
5:	Is the system or electronic information collection, agency or contractor operated?		Agency

PTA

PTA

PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	N/A
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.	Travel Risk Assessment, Accountability, Clearance and Incident Reporting (TRACI) provides CDC a comprehensive system that identifies employees on travel and ensures they are effectively prepared and accounted for in the case of an emergency. TRACI will enable employees and their supervisors to prepare for travel, provide accountability during travel, and report incidents.
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.	Travel Risk Assessment, Accountability, Clearance and Incident Reporting (TRACI) provides CDC a comprehensive system that identifies employees on travel and ensures they are effectively prepared and accounted for in the case of an emergency. TRACI will enable employees and their supervisors to prepare for travel, provide accountability during travel, and report incidents. The system collects the following types of PII:

Name

Employment Status

E-Mail Address

Phone Numbers

Training data

Employment type

Medical clearance status

User and HHS ID

Travel Dates and Details

Respirator Test Results

Administrative code

Campus Building/Office

TRACI will also integrate data from multiple disparate systems utilized for employee travel preparation, clearance, and tracking. While the data is consolidated in TRACI, it is maintained and governed by the originating system; the systems/applications and the information provided from each is identified below:

Global Travel (a separate system with its own PIA): readiness for those who submitted travel assessment request and their dependents, including: Person ID, User ID, First Name, Middle Name, Last Name, courses attended, course completion date and expiry date.

Learning Management System (a separate system with its own PIA): course readiness information, including, training Record ID, User ID, HHS ID, Last name, Middle Name, First Name, CDC Admin Code, Employment Type and Status, Training course details – Course name, Course Description, Start Date, Completion Date, information needed for risk assessment, review and approval, including domestic and International travel risk assessment - Details of requestors, proposed travel details for purpose of review/approval, travel readiness tasks, roles, Admin and Approver.

Medgate (a separate system with its own PIA)– Respiratory fit test, including: Respirator Description, Respirator Size and Description, Respirator Test Status, and Medical Clearance status.

CDC Responder (a component under the accreditation boundary of CDC Neighborhood (CDCN). CDCN is a separate system with its own PIA): Details of position, requestor, travelers, and

travel dates.

This data is used by CDC employees and their supervisors as well as the Office of Safety, Security, and Asset Management (OSSAM) to prepare for travel, provide accountability during travel, and report incidents.

Employee Location

PTA - 5A: Are user credentials used to access the system?

PTA - 5B: Please identify the type of user credentials used to access the system.

<p>PTA - 6:</p>	<p>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>	<p>TRACI collects the potential travel plans and traveler data of such as Name, travel destination, User ID, Email address, Work Phone Number, Admin Code, Campus/Building and Office.</p> <p>TRACI will also integrate data from multiple disparate systems utilized for employee travel preparation, clearance, and tracking. While the data is consolidated in TRACI, it is maintained and governed by the originating system; the systems/applications and the information provided from each is identified below:</p> <p>Global Travel (a separate system with its own PIA): readiness for those who submitted travel assessment request and their dependents, including: Person ID, User ID, First Name, Middle Name, Last Name, courses attended, course completion date and expiry date.</p> <p>Learning Management System (a separate system with its own PIA): course readiness information, including, training Record ID, User ID, HHS ID, Last name, Middle Name, First Name, CDC Admin Code, Employment Type and Status, Training course details – Course name, Course Description, Start Date, Completion Date, information needed for risk assessment, review and approval, including domestic and International travel risk assessment - Details of requestors, proposed travel details for purpose of review/approval, travel readiness tasks, roles, Admin and Approver.</p> <p>Medgate (a separate system with its own PIA)– Respiratory fit test, including: Respirator Description, Respirator Size and Description, Respirator Test Status, and Medical Clearance status.</p> <p>CDC Responder (a component under the accreditation boundary of CDC Neighborhood (CDCN). CDCN is a separate system with its own PIA): Details of position, requestor, travelers, and travel dates.</p> <p>This data is used by CDC employees and their supervisors as well as the Office of Safety, Security, and Asset Management (OSSAM) to prepare for travel, provide accountability during travel, and report incidents.</p> <p>Users access and authenticate to TRACI via Active Directory (AD). AD is a separate system with its own PIA.</p>
<p>PTA - 7:</p>	<p>Does the system collect, maintain, use or share PII?</p>	<p>Yes</p>
<p>PTA - 7A:</p>	<p>Does this include Sensitive PII as defined by HHS?</p>	<p>Yes</p>
<p>PTA - 8:</p>	<p>Does the system include a website or online application?</p>	<p>Yes</p>
<p>PTA - 8A:</p>	<p>Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?</p>	<p>No</p>

PTA - 9:	Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response.	<p>The system can be accessed internally on the web via traci.cdc.gov.</p> <p>Travel Risk Assessment, Accountability, Clearance & Incident Reporting (TRACI)</p> <p>Access to the TRACI application is limited to authorized, internal CDC users with a valid CDC network account. In addition, a user's role(s) and data access rights are based upon their position and need to know. User access to PII is governed by the application role and/or position that they are assigned and restricted to need to know information. These determinations are made by supervisors and implemented by application account managers.</p> <p>Administrators: Review validity of certifications and generate reports on completion of travel training. There are no administrative roles for contractors, as Admin Roles are restricted to only Full-Time employees.</p> <p>Developers: Review the system functionality and troubleshoot problems. Direct contractors may have development duties in TRACI, however contractors will only have access to the TRACI development environment. Only Full Time Employees will have access to the Production environment.</p> <p>Contractors: Direct contractors act as developers in the set up, design, and bug-fixes for the TRACI application. However, these contractors will only work in the development environment.</p>
PTA - 10:	Does the website have a posted privacy notice?	Yes
PTA - 11:	Does the website contain links to non-federal government websites external to HHS?	No
PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
PTA - 12:	Does the website use web measurement and customization technology?	No
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	
PTA - 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA - 13A:	Does the website collect PII from children under the age thirteen?	No
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 Employment Status Other - Free text Field - Employment type, Training data, Medical clearance status, User and HHS IDs, Travel dates and details, Respirator Test Results, Administrative code, Campus Building/Office
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Employees/ HHS Direct Contractors
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?	The PII collected within TRACI is to ensure that CDC staff traveling to accomplish various missions are adequately prepared for the travel, e.g., that they have completed all required safety and security trainings, medical clearances, etc.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	None
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	NA
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	NA

PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	5 U.S.C. 1302, 2951, 3301, 3372, 4118 and 8347; Executive Orders 12107, 12196, and 12564.
PIA - 8:	Are records in the system retrieved by one or more PII data elements?	Yes
PIA - 8A:	Please specify which PII data elements are used to retrieve records.	Name Email Address Phone Numbers User and HHS IDs TRACI system is web-based application internally used by employees of CDC and the system is not available to access outside of CDC network or external users. The application collects the potential travel plans and data of the travelers including low PII information such as Name, traveling country etc. The system also collects the travel details from Global Travel System (GTS), Training details from the Learning Management System (LMS), some of the personal information from MISO_CCPS DB (admin code, name, phone, email, location, FTE or not) and also some of the health information (Pass/fail only and date test was completed) like respiratory test details from Cority. These PII data elements are used to retrieve records for CDC. In the event of a loss of confidentiality, the email addresses would be compromised. This risk has been determined to be Low and could result in increased spam but not identity theft.
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.	OPM/GOVT-1 General Personnel Records OPM/GOVT-10 Employee Medical File System Records. 09-40-0002 Public Health Service (PHS) Commissioned Corps Medical Records
PIA - 9:	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains Online Government Sources Within the OPDIV
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.	No information is collected from the general public.
PIA - 11:	Is the PII shared with other organizations outside the system's Operating Division?	No
PIA - 11A:	Identify with whom the PII is shared or disclosed.	

PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	
PIA - 11C:	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	
PIA - 11D:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII. If no process or procedures are in place, please explain why not.	
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 12A:	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
PIA - 13:	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	As TRACI does not collect information directly from the user but rather from other systems, those systems have the responsibility of notifying individuals.
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.	If major changes were to occur to the system, a CDC-wide electronic notice would be dispensed to alert users with information within the system that the system was being updated. The underlying systems will alerts users when they go through major changes, however since TRACI is going to be the central hub for federal employee travel, users will also be notified when TRACI undergoes major changes.
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.	Individuals may contact the Digital Services Office (DSO) Helpdesk or Cybersecurity Program Office (CSPO) if they believe their PII has been inappropriately obtained. Individuals can contact the Help Desk via phone or email. The Helpdesk phone number is 404-639-7500, and a SNOW ticket is submitted via ServiceNow to be triaged by the Helpdesk.
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.	Administrators review records on an ongoing basis for accuracy. These records are matched against CDC Neighborhood (the parent system of CDC Responder) where each user is asked to update and correct information annually.
PIA - 17:	Identify who will have access to the PII in the system.	Administrators Developers Contractors
PIA - 17A:	Select the type of contractor.	HHS/OpDiv Direct Contractors
PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes

PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	<p>Administrators - Review validity of certifications and generate reports on completion of travel training. There are no administrative roles for contractors, as Admin Roles are restricted to only Full Time employees.</p> <p>Developers - Review the system functionality and troubleshoot problems. Direct contractors may have development duties in TRACI, however contractors will only have access to the TRACI development environment. Only Full Time Employees will have access to the Production environment.</p> <p>Contractors - Direct contractors act as developers in the set up, design, and bug-fixes for the TRACI application. However, these contractors will only work in the development environment.</p>
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Access to the TRACI application is limited to authorized, internal CDC users with a valid CDC network account. In addition, a user's role(s) and data access rights are based upon their position and need to know. User access to PII is governed by the application role and/or position that they are assigned and restricted to need to know information. These determinations are made by supervisors and implemented by application account managers.
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.	TRACI utilizes Least Privilege Role Based Access Control (RBAC) to manage user access to data elements. RBAC is used to establish roles that limit access to TRACI reports to only those reports that are required for the user to perform their job under least privilege. The roles determine what data types are available to a user. RBAC also uses exceptions to limit the scope of the record sets that are returned to the user based on administrative codes (identifiers for specific CDC organizational units).
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 CDC users are required to take the Security and Privacy Awareness trainings at least annually.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	None

PIA - 23:

Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).

All official records are transferred or destroyed based on CDC record management policies and practices. The following records schedules apply to the system:

5.2: Input/Source Records - Electronic records received from another agency.

Destroyed when verified in new final record.

5.2: Input/Source Records - uncalibrated or unvalidated observational data

Destroyed when verified in new final record.

5.2: Print file

Destroyed when verified in new final record.

CDC, RCS, B-321, 4-1d

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.

Administrative: Records are maintained according with CDC's record control schedule and record control policy. This information is secured using the CDC Active Directory authentication process and role-based application control.

Technical: Monitored by the Network and IT security controls which are administered by the Cybersecurity Program Office (CSPO) and the Digital Services Office's (DSO) Infrastructure Services Branch (ISB). The controls include user authentication/authorization, firewalls and encryption. Data obfuscation is applied to user roles based on authorization. Unauthorized users do not have access to PII.

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

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	12/18/2024
Privacy Analyst Comments:	Please add notes for PIA-8A	Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	Approved on behalf of Beverly Walker	SOP Review Date:	1/7/2025
		SOP Days Open:	20

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	1/24/2025
Agency Privacy Analyst Review Comments:	Reviewer: Shanai Shobowale 1/24/2025 This PIA is ready for SAOP review and approval.	Agency Privacy Analyst Days Open:	17

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:		SAOP Review Date:	2/11/2025
		SAOP Days Open:	18

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 8A	Data Feed Service, piafrmdc	11/20/2024	Only identify the PII direct identifiers used to retrieve the records.	
PIA - 8A	Data Feed Service, piafrmdc	12/5/2024	Please remove data elements that are no direct identifiers. For example, employment type and status, building, and admin code are not direct identifiers. A direct identifier points explicitly to an individual on its own.	

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: 2/11/2025 7:02 PM

History Log: [View History Log](#)