

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

PIA Name:	CDC - CDCV - QTR1 - 2024 - CDC7412828	PIA ID:	1759596
Name of Component:	CDC - CDC Vault	Name of ATO Boundary:	CDC Vault
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	42
Submission Status:	Re-Submitted	Submit Date:	2/2/2024
Next Assessment Date:	N/A	Expiration Date:	3/1/2027
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC7412828
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.		2/26/2024
5:	Is the system or electronic information collection, agency or contractor operated?		Contractor

PTA

PTA

PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	Conversion
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	Converting PTA to archer from previous documents.
PTA - 3:	Is the data contained in the system owned by the agency or contractor?	Agency

PTA - 4:	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions.	<p>The purpose of the CDC Vault (CDCV) is to make non-public publications and other non-public files available only within the CDC community. Unlike file sharing and other systems at CDC, CDCV provides a unique value to the agency by allowing users to find documents using a full text search of the object title, meta-data, and even the document's contents (if the object is a document).</p> <p>CDCV also allows the originating center to restrict access to the documents to sub-sets of users - as defined by the center and their data owners. Centers can have more than one collection so that they can restrict or open up distribution as needed - each collection having a different distribution audience. As an example, CDC Vault is acting as the interim storage repository for federal records during retention and automates proper replication to the National Archives as maintained by the National Archives and Records Administration.</p>
PTA - 5:	List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.	<p>CDC Vault (CDCV) is designed to handle many potential data types since it's intended to support the needs of different teams across CDC. CDCV data could be documents, files, or media of any nature. Examples of specific CDC data elements found in CDC documents, files or media may include Congressional inquiries, un-cleared pre-publication documents, federal records under retention, documents under copyright embargo, data dictionaries, raw data exports, hand-outs, fliers, and advertisements.</p> <p>Possible sensitive data that may be stored in CDCV is publically identifiable information (PII) such as Social Security Numbers SSNs, names, dates, etc. and placed on documents or in data files. PII data is not by default transmitted and collected but maintained; the one exception being the Federal Records collection. CDC Vault stores documents from CDC centers that may contain PII with the systems primary function of record keeping. SSNs are not used by CDCV. Content administrators, called Catalogers, have access to this site to manage their respective content catalogs. They can grant/remove access to the files in their catalog. System administrators also have access to files as they are the ones hired and tasked with maintaining the operating environment.</p>
PTA - 5A:	Are user credentials used to access the system?	
PTA - 5B:	Please identify the type of user credentials used to access the system.	

PTA - 6:	Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual.	<p>CDCV Data formats include documents, files, or media of any nature. Data is typically manually uploaded by the various CDC centers. As such, there is no specific list of what type of data is maintained. CDCV instead expects all types of data will be in the files and protects them to the best means available.</p> <p>CDC Vault is designed to handle many potential data types, as it supports the file storage needs across multiple CDC centers, institutes, and offices. While CDC Vault does not use PII directly, CDC Vault may contain files with PII data.</p> <p>Only one catalog of files is shared with another system. This catalog is specifically built to process and hold files that are labeled as Federal Records under the Federal Records Act. These files are shared with the National Archives and Records Administration (NARA).</p>
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	Yes
PTA - 8:	Does the system include a website or online application?	Yes
PTA - 8A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	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 by the centers when adding data to the system. The centers can use the website to control who has access to their data. Authentication is via CDC issued PIV authentication and is challenged during the establishment of the secure (HTTPS) connection.
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?	Yes
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	Web bug/beacons - Does Not Collect PII Session Cookies - Does Not 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.	Social Security Number Truncated SSN Name Mother Maiden Name Email Address Phone numbers Medical records (PHI) Certificates Education Records Military Status Foreign Activities Taxpayer ID Date of Birth Photographic Identifiers Biometric Identifiers Vehicle Identifiers Mailing Address Medical Records Number Financial Account Info Legal Documents Devices Identifiers Employment Status Passport Number User Credentials Patient ID Number Driver License Number Others - Chart No., TIN, DUNS, Provider License #
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Business Partners/Contacts (Federal, state, local agencies) Employees/ HHS Direct Contractors Grantees Patients Members of the public Vendors/Suppliers/Third-Party Contractors (Contractors other than 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 is not used by CDC Vault. Vault stores sensitive documents that may contain PII. The usage of PII is related to the nature of each object that is stored in Vault and not a function of CDC Vault itself.
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.	The SSNs are a potential residual of storing unaltered documents and files, SSNs and taxpayer ID numbers are not by themselves a function of the system. CDCV does not know which documents contain SSNs or Taxpayer IDs; therefore, it considers all documents/files to contain sensitive information and protects it accordingly.
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	SSNs are not used by CDCV.
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	45 CFR 74.36 (Government Use License) 5 USC 301, Departmental regulations (UserID and DeviceID)
PIA - 8:	Are records in the system retrieved by one or more PII data elements?	No
PIA - 8A:	Please specify which PII data elements are used to retrieve records.	
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.	
PIA - 9:	Identify the sources of PII in the system.	Government Sources Within the OPDIV Other HHS OPDIV State/Local/Tribal Foreign Other Federal Entities Other
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.	CDCV does not collect information, CDCV only maintains and secures it.
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.	CDC Vault does not have any data fields that contain PII. Files stored by data owners may contain PII and it is up to the data owners to have an opt-out process with 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.	CDC Vault does not have any data fields that contain PII. Files stored by data owners may contain PII and it is up to the data owners to obtain consent and notify individuals that PII is being stored.
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 that have PII in the system will not know that their PII is in the system. The CDC center data owner of each collection is responsible for removing any PII or any files containing PII from the system. The CDC center data owners are the people that have uploaded the originating document/file to CDCV.
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.	It is up to the CDC center data owners (original data source to CDCV) to develop a process for periodic reviews of their documents in CDC Vault. Vault's purpose is to provide limited distribution and long-term storage of documents and files.
PIA - 17:	Identify who will have access to the PII in the system.	Users Administrators 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.	User access is determined by the data owners. The data owners can add/remove user access based on their individual needs. Administrators have full access to the system in order to maintain the system in accordance to their job duties. CDC badged contractors may have access depending on duties. Some administrators are contractors and some users are contractors.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	CDC Vault's role-based and rule-based access control allows the CDC center data owners have full control of their own document access rights and distribution audience.

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.	CDC Vault is designed with a role of data owner. This role is given to anyone that has uploaded data to CDC Vault. Each data owner then has the ability to restrict access to their catalog (a group of objects in CDC Vault) or individual files to individual users, individual centers, or all internal CDC personnel. The decision of who should have access is determined by the data owner in accordance with their own policies to minimize data exposure. CDC Vault is designed to provide as much access fidelity as required by each data owner.
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 users are CDC personnel that go through annual security awareness training and learn about the policies for protecting information.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	Training is available to document owners on how to use CDC Vault in a secure manner. The training is optional since not all data owners deal with sensitive information. The training includes staying aware of the privacy impacts related to any documents stored on CDC Vault.
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).	It is up to the document owners to define a retention schedule for documents placed in CDC Vault. Vault, by default, does not destroy/edit/delete/redact data. Vault's intended function is to be a long-term, non-public storage system.
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.	<p>Administrative controls: Data owners can define who has access to what document during the upload process - thus allowing the data owner full control over the distribution of any PII in their data.</p> <p>Technical controls: CDCV uses customized code developed by CDCV to enforce the least privilege policy defined by each data owner.</p> <p>Physical controls: Access to the physical system is restricted to the server administrators (a separate group from both the CDC Vault staff and the center data owners). Furthermore, all data is stored on an encrypted storage.</p>

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	2/5/2024
Privacy Analyst Comments:	OpDiv Privacy Analyst: Joshua Mosios Status: Approved Date: February 5, 2024	Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	Approved on behalf of Beverly Walker	SOP Review Date:	2/6/2024
		SOP Days Open:	4

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	2/7/2024
Agency Privacy Analyst Review Comments:	Reviewer: Nestor Villafuerte This PIA is ready for SAOP review and approval,	Agency Privacy Analyst Days Open:	1

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Signature.docx
SAOP Comments:	Approved on behalf of Bridget Guenther	SAOP Review Date:	3/1/2024
		SAOP Days Open:	23

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 7	Data Feed Service, piafrmc dc	1/25/2024	Must be answered	
PIA - 1	VILLAFUERTE, NESTOR	2/7/2024	PTA-5 - Please make sure that all PII data elements mentioned in PIA-1 is included in your response in PTA-5	

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: 2/24/2025 7:01 PM

History Log:

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