

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 - ACCPAC - QTR1 - 2023 - CDC6706248	PIA ID:	1637416
Name of Component:	CDC - Visiting Fellows Payroll System	Name of ATO Boundary:	Visiting Fellows Payroll System
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	330
Submission Status:	Re-Submitted	Submit Date:	1/24/2024
Next Assessment Date:	N/A	Expiration Date:	2/6/2027
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC6706248
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.		1/9/2024
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.	This system is due its annual assessment. There were no changes to the system since the last PIA.
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 Visiting Fellows Payroll System (ACCPAC) is an enterprise resource planning (ERP) solution that enables CDC with the capability to produce payroll for its Visiting Fellows and Epidemic Intelligence Service (EIS) Officers, the majority of whom are non-US residents. As a result, of their international status, their payroll tax computations are extremely complex.</p> <p>ACCPAC calculates federal, state, and Federal Insurance Contributions Act (FICA) taxes, creates year-end W-2's for tax purposes, and produces electronic W-2's for magnetic filing to the Social Security Administration (SSA). The system facilitates determinations regarding the appropriateness of applied tax rates for these international program officers, thereby ensuring correct tax treatment.</p> <p>Each month, ACCPAC users enter data relating to both taxable Change of Station Vouchers and Visiting Fellows / EIS Officers payroll. The Visiting Fellow/EIS Officer payroll is generated at the end of each month. An export file of the payroll is produced. This file is validated with Purchase Order information that is downloaded from the Unified Financial Management System (UFMS). Stored procedures are used for the validation process as well as to reformat the data to prepare it for transfer to UFMS.</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.	The system does collect social security numbers, names, mailing addresses, employment status, taxpayer identification and taxpayer withholding information. CDC users access this system using Active Directory. The system also includes salary payment information for each Visiting Fellow/Epidemic Intelligence Service (EIS) Officer.
PTA - 5A:	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
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.	The system does collect social security numbers, names, mailing addresses, employment status, taxpayer identification and taxpayer withholding information. The system also includes salary payment information for each Visiting Fellow/Epidemic Intelligence Service (EIS) Officer. The information is only used for the purpose of processing the payroll for CDC's Visiting Fellows and EIS Officers. The Visiting Fellows and EIS Officers voluntarily provide the PII as a condition of employment. The SSN's function is three-fold: 1- When making payments through this system, the taxpayer Identifying number (TIN) is a required data element for a proper payment record (5 Code of Federal Regulation (CFR) 1315.9 (b) (vii)). 2- Also, to ensure that CDC complies with the Debt Collection Act and Debt Collection Improvement Act, which allow for the offset of Federal payments to collect debts owed to the United States, a TIN is required as one of the primary data matching elements (5 CFR 285.5). 3- In addition, the SSN is required on the W-2 forms by Internal Revenue Code sections 3402(f)(2) and 6109.
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?	No
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.	I
PTA - 10:	Does the website have a posted privacy notice?	
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.	Social Security Number Name Taxpayer ID Mailing Address Employment Status Other - Free text Field - Tax Withholding
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Employees/ HHS Direct Contractors 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.	201 - 500
PIA - 4:	For what primary purpose is the PII used?	The Personally Identifiable Information (PII) is used to process the payroll for CDC's Visiting Fellows and Epidemic Intelligence Service (EIS) Officers.
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 SSN's function is three-fold: 1- When making payments through this system, the taxpayer Identifying number (TIN) is a required data element for a proper payment record (5 CFR 1315.9 (b) (vii)). 2- Also, to ensure that CDC complies with the Debt Collection Act and Debt Collection Improvement Act, which allow for the offset of Federal payments to collect debts owed to the United States, a TIN is required as one of the primary data matching elements (5 CFR 285.5). 3- In addition, the SSN is required on the W-2 forms by Internal Revenue Code sections 3402(f)(2) and 6109.
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	Prompt Payment Act (5 CFR 1315.9); Treasury Offset Program (31 CFR 285.5); 5 CFR 1315.9 (b) (vii); and 26 USC Sections 3402(f)(2) and 6109.
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	Budget and Accounting Act of 1950 (Pub. L. 81-784); Debt Collection Act of 1982 (Pub. L. 97-365); and Debt Collection Improvement Act of 1996 (Pub. L. 104-134, sec. 31001).
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.	Social Security numbers, names and mailing addresses 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.	09-90-0024, "Financial Transactions of HHS Accounting and Finance Offices"
PIA - 9:	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains Hard Copy Mail/Fax Government Sources Within the OPDIV Other Federal Entities 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 - information is not sourced or collected from the public.
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
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	To exchange data with the HHS Unified Financial Management System (UFMS).

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)).	There is an Interconnection Security Agreement in place for the exchange of data with the HHS Unified Financial Management System.
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.	The CDC Office of Financial Resources maintains electronic archival copies of disclosure requests and responses. These records are secured and accessible to system users only.
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.	The Visiting Fellows and EIS Officers provide their personal information directly to the Office of Financial Resources using the Direct Deposit Sign-Up Form (SF 1199A) and the Employee's Withholding Allowance Certificate (W-4 Form). Each form provides notification that personal information is required to be collected, as well as how it will be used.
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.	There is no option to object to the information collection. The Visiting Fellows and EIS Officers are required to provide their PII as a condition of employment. If they choose not to share their PII, they cannot obtain employment with CDC.
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/when major system changes were to occur, the SORN would be modified and republished to the public.
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.	They can notify the Office of Financial Resources and the Travel, Intra-government Payment and Collection System (IPAC), & International Payments Branch (TIIPB) will review the complaint and respond appropriately. Individuals must reasonably identify the record, specify the information to be contested, and state the corrective action sought along with the reasons for the correction.
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.	Visiting Fellows Payroll System (ACCPAC) users rely upon the employees to submit correct PII information. Employees receive a W-2 Form annually and can report any errors in PII upon receipt. In addition, employees receive a monthly pay stub. Incorrect addresses will be returned to the Office of Financial Resources. Reported errors are corrected and the document is resubmitted to the employee and agency if necessary. Any irrelevant PII received from the employee is destroyed.
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.	<p>Users access Payroll and W-2 information.</p> <p>Administrators prepare Payroll file transfer to the HHS Unified Financial Management System.</p> <p>Direct contractors may prepare Payroll file transfer to the HHS Unified Financial Management System.</p>
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	User permissions and roles identify who will have access based on the least privileged principle. Access levels are determined via Role Based Access Control (RBAC).
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.	User profiles with varying access levels are assigned within this system, based on the needs of each individual to perform their job. Only those users who will need to access PII to perform their job functions have access to PII. The least privileged model with a need to know is utilized.
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.	Users are required to take annual Information Security Awareness Training and Privacy Awareness Training.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	Users are required to take Records Management 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).	When an employee is separated payroll retirement information is transferred to the Federal Retirement Records Center in Boyers, PA. Printed reports that include PII are retained on site for at least two years, before being transferred to the Federal Records Center. All documents containing PII are shredded before being disposed. The applicable records retention schedule is: GRS 2:13
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 are assigned. Users of ACCPAC need full update access to the system. The system has a very small number of users. All requests for access to the data are tightly scrutinized. Users are required to take Annual Privacy and Security training.</p> <p>Technical Controls include authentication, database encryption and firewalls. Accounts are locked after a set number of incorrect password attempts. The ACCPAC data is protected by encrypted algorithms.</p> <p>Physical Controls include security guards, identification badges, locked doors and key cards.</p>

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	1/24/2024
Privacy Analyst Comments:	PTA has been modified.	Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	Approved on behalf of Beverly Walker	SOP Review Date:	1/24/2024
		SOP Days Open:	0

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	1/29/2024
Agency Privacy Analyst Review Comments:	<p>Reviewer: Shanai Shobowale</p> <p>It seems CDC resolved the issues. This PIA is ready for SAOP review and approval.</p> <p>We notice that question PTA-8 was marked "No" there is no website, online application, or URL but CDC continue to answer questions PTA-8a – PTA-14, which are the website, online application, and mobile application.</p> <p>Per CDC's Email, there is a Archer glitch, as the PTA does not align up with the PIA. CDC will reach out to their Archer Dev Group to inform them of the issue.</p>	Agency Privacy Analyst Days Open:	5

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:	<p>PTA 10 shows error instead of a response, must be an Archer error.</p> <p>We notice that question PTA-8 was marked "No" there is no website, online application, or URL but CDC continue to answer questions PTA-8a – PTA-14, which are the website, online application, and mobile application.</p> <p>Per CDC's Email, there is a Archer glitch, as the PTA does not align up with the PIA. CDC will reach out to their Archer Dev Group to inform them of the issue.</p>	SAOP Review Date:	2/7/2024
		SAOP Days Open:	9

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
Emai_Re_CDC PIA_1_12_2024.pdf	253217	.pdf	1/12/2024 3:27 PM	0

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 12	Data Feed Service, piafrmihs	3/16/2023	<p>Please select "Voluntary" unless a federal law or executive order specifically imposes a requirement to furnish the information and provides a civil or criminal penalty for failure to do so. If furnishing the information is a condition for granting a benefit or privilege voluntarily sought by the individual, it is a voluntary submission. If PII in this system is sourced from other systems, the answer should be voluntary unless the collection of PII into those systems was mandatory.</p> <p>OMB guidance on the Privacy Act explains that all requests are voluntary unless not providing the requested PII would lead to a civil or criminal penalty. There are situations in which the consequences for not providing one's PII could be job loss, withholding of health insurance, or other negative repercussions. Despite those repercussions, OMB still considers these decisions to be voluntary.</p>	
PIA - 1	BLAND, CRYSTAL	1/12/2024	<p>Update for the PTA:</p> <p>PTA-8: CDC respond "No" to there being any website of online application but than answer the remaining questions on the PTA-8a-PTA-14, which are the website and mobile application questions.</p>	
PIA - 1	Data Feed Service, piafrmc dc	9/30/2024	<p>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.</p>	

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:

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