

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 - VLTP - QTR2 - 2023 - CDC6788054	PIA ID:	1679930
Name of Component:	CDC - Voluntary Leave Transfer Program	Name of ATO Boundary:	Voluntary Leave Transfer Program
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	339
Submission Status:	Re-Submitted	Submit Date:	5/13/2024
Next Assessment Date:	N/A	Expiration Date:	1/1/2100
Office:		OPDIV:	CDC
Security Categorization:	Moderate	OpDiv PIA ID:	CDC6788054
Legacy PIA ID:	6788054	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.		5/30/2024
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.	None
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 voluntary leave transfer program is an internal CDC web-based application that supports a standard civil service process by the same name that permits the donation of annual leave by employees to other employees with an approved hardship.</p> <p>Individuals request that their hardship be approved for VLTP by submitting a VLTP request form to (Human Resources Office) HRO. When the hardship is approved for VLTP, the VLTP administrator will manually enter the requestor's information into the VLTP application including the requestor's name, userID, and the start and end dates for the approved hardship.</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>VLTP data elements consist of CDC User IDs, Participant Name, Participant Social Security Number (SSN), Medical Reason, Emergency Type, Donation Start Date, Donation End Date, Expiration Date, Payroll and leave information (pay period and hours). VLTP stores how many hours a user wishes to donate, start and end dates for approved hardships, and total number of hours donated.</p> <p>Users are authenticated through Active Directory and thus their usernames and passwords are not stored via this method. Active Directory is a separate system covered by a separate Privacy Impact Assessment (PIA).</p>
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.	

<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>Individuals request that their hardship be approved for VLTP by submitting a VLTP request form to Human Resources Office (HRO). When the hardship is approved for VLTP, the VLTP administrator will manually enter the requestor's information into the VLTP application including the requestor's name, CDC userID, and the Donation start and Donation end dates for the approved hardship. The information collection is used to identify the individuals to whom the hardship leave is requested and the donating employee.</p> <p>Within the Time and Attendance (TAS) application which is a separate system with its own PIA, donating employees may select the individual(s) to whom they would like to donate their annual leave and the number of leave hours to donate. This information along with the donor's userID is pushed to VLTP tables, maintained within the TASNet database. Those tables are VLTP specific and are labeled as such.</p> <p>VLTP dynamically generates a leave donation report containing the donor's SSN, number of donated leave hours, and the beneficiary's SSN. This report can only be accessed by VLTP administrators and is used to manually update an HHS system that tracks donated leave. This report contains employee SSNs because the information is mandatory for the HHS system that HRO updates manually (with the information contained in the report) to complete the leave donation process. This report, however, is not stored in VLTP. Each time an administrator accesses the report, the system builds a new copy.</p> <p>Although SSNs are processed within VLTP, they are not stored on a permanent basis. When the report is closed, the SSNs are removed from memory. The SSN is a unique identifier required by Defense Finance and Accounting Services (DFAS) to process employee leave and compensation transactions. DFAS processes payroll for the employees of CDC.</p> <p>Users are authenticated through Active Directory and thus their usernames and passwords are not stored via this method. Active Directory is a separate system covered by a separate PIA.</p> <p>This application processes PII and SSN data, but only stores PII information and not SSN.</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 Voluntary Leave Transfer Program (VLTP) is an internal CDC web-based application (https://vltp.cdc.gov) that supports a federal civil service program that permits employees to donate annual leave to other employees with an approved hardship. Users access the website via (https://vltp.cdc.gov). Employees have access to their own data and may review it as needed. Administrators also do an annual review of the data in the system per policy.</p> <p>Users - To maintain information needed for processing donated leave. As well as o provide maintenance and upgrades to the system.</p> <p>Administrators - To assist employees with donating leave and approve leave donations for their assigned employees.</p> <p>Developers - To assist employees with donating leave and approve leave donations for their assigned employees.</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?	
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 User Credentials Other - Free text Field - Employment information.
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 (including User credentials) is required in order to process employee leave and compensation transactions.
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 is a unique identifier required by DFAS to process employee leave and compensation transactions.
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	Executive Orders 9397, as amended by 13478, 9830, and 12107
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, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107
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 and SSN
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
PIA - 9:	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains In-person 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.	VLTP does not collect PII 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.	Within HHS
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	HHS maintains the Agreement with DFAS to process payroll and the accounting of disclosures.
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)).	None with CDC, HHS maintains the Agreement with DFAS to process all payroll for HHS and the Operational Divisions (OpDivs).
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.	<p>Individuals request that their hardship be approved for VLTP by submitting a VLTP request form to HRO. When the hardship is approved for VLTP, the VLTP administrator will manually enter the requestor's information into the VLTP application including the requestor's name, userID, and the start and end dates for the approved hardship.</p> <p>Within the Time and Attendance (TAS) application (tasnet.cdc.gov), donating employees may select the individual(s) to whom they would like to donate their annual leave and the number of leave hours to donate. This information along with the donor's userID is pushed to VLTP tables, maintained within the TASNet database. Those tables are VLTP specific and are labeled as such.</p> <p>VLTP dynamically generates a leave donation report containing the donor's SSN, number of donated leave hours, and the beneficiary's SSN. This report can only be accessed by VLTP administrators and is used to manually update an HHS system that tracks donated leave. This report contains employee SSNs because the information is mandatory for the HHS system that HRO updates manually (with the information contained in the report) to complete the leave donation process. This report, however, is not stored in VLTP. Each time an administrator accesses the report, the system builds a new copy.</p> <p>Although SSNs are processed within VLTP, they are not stored on a permanent basis.</p>
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.	This consent and notification occur within CapHR and People Processing, where the PII information is collected, not VLTP. Users consent to this use of their PII for pay and benefits purposes during their in-processing.
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.	Notifications of significant changes are posted to the CDC internal web site. However, as the PII is collected from another system, direct notification to the individual is not handled by VLTP.
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.	Users can contact the Application Services Branch Help Desk or Cybersecurity Program Office (CSPO) directly. Employees are also able to view their own data. The helpdesk will open a ticket and forward it to the appropriate entity to address the misuse or inappropriate collection of their PII. The Help-desk phone number is 404-639-7500, and the Helpdesk email address is magichelp@cdc.gov.
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.	Employees have access to their own data and may review it as needed. Backup servers are in place in case of failure so operations may continue. Administrators also do an annual review of the data in the system per policy.
PIA - 17:	Identify who will have access to the PII in the system.	Users Administrators Developers
PIA - 17A:	Select the type of contractor.	
PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	
PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	User: To maintain information needed for processing donated leave. As well as o provide maintenance and upgrades to the system. Administration: To assist employees with donating leave and approve leave donations for their assigned employees. Developers: To provide maintenance and upgrades to the system.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	VLTP roles are associated with a user's business function. The roles are requested, approved, and authorized. A user's restricted access to PII is enforced through the use of operating system accounts within Active Directory.
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.	A membership model and AD user roles are built into the accounts to allow access to information based on an individual's assigned system role.

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.	Security Awareness Training (SAT), and Privacy training. Provided prior to initial authorization and 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).	<p>Records are retained and disposed of in accordance with the CDC Records Control Schedule. VLTP falls under GENERAL RECORDS SCHEDULE 5.2: Transitory and Intermediary Records. This schedule covers records of a transitory or intermediary nature. Transitory records are routine records of short term value (generally less than 180 days). Intermediary records are those involved in creating a subsequent record. These records do not document significant decisions or actions an agency takes.</p> <p>VLTP is classified as Intermediary records, which means the retention is Temporary. Destroy upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later. Disposal methods include erasing computer tapes, and burning or shredding paper materials.</p>
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: Records are maintained according with CDC's record control schedule and record control policy. The PII is secured using the CDC Information System Active Directory authentication process and role-based application control via Role Based Access Control (RBAC).</p> <p>Technical: Monitored by the Network and IT security controls which is administered by the Cybersecurity Program Office (CSPO).</p> <p>Physical: Controls are managed by security guards, ID badges and key card restrictions.</p>

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	5/13/2024
Privacy Analyst Comments:	OpDiv Analyst: Joshua Mosios (Contractor)	Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	Approved on behalf of Beverly Walker	SOP Review Date:	5/15/2024
		SOP Days Open:	2

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	5/21/2024
Agency Privacy Analyst Review Comments:	Reviewer: Nestor Villafuerte 5/21/2024 This PIA is ready for SAOP review and approval.	Agency Privacy Analyst Days Open:	6

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:		SAOP Review Date:	6/3/2024
		SAOP Days Open:	13

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments				
Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmcdc	4/29/2024	Please select "user credentials" and write "employment information" in the "other -free text field"	
PIA - 4	Data Feed Service, piafrmcdc	4/29/2024	Please provide purpose(s) for the other PII (name, employee information, user credentials)	
PIA - 11B	Data Feed Service, piafrmcdc	4/29/2024	Please briefly describe the relationship between CDC and HHS and how an HHS agreement affects CDC.	
PIA - 15	Data Feed Service, piafrmcdc	4/29/2024	Please update answer to reflect change in organizational structure (i.e., OCSIO is now CSPO). Please define all acronyms upon first use.	
PIA - 13	Data Feed Service, piafrmcdc	4/29/2024	Wasn't People Processing retired? If so, please update answer. If not, please disregard.	
PIA - 24	Data Feed Service, piafrmcdc	4/29/2024	Please update your response in "technical" to reflect the updates in organizational structure.	
PIA - 19	Data Feed Service, piafrmcdc	5/13/2024	Has OS been defined?	
PIA - 24	Data Feed Service, piafrmcdc	5/13/2024	Has IS been defined?	
PIA - 15	Data Feed Service, piafrmcdc	5/13/2024	Has ASB been defined?	
PIA - 1	Data Feed Service, piafrmcdc	9/30/2024	This System has been migrated within the OCIO ISB Infrastructure Services authorization boundary. All future updates should be made via the new Sub- Component application.	

Admin Section

Is OpDiv Privacy Analyst Approved ?:

1

Is 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](#)