

## Copy PIA (Privacy Impact Assessment)

Do you want to copy this PIA ?

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

## Instructions


Review the following steps to complete this questionnaire:

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

### Acronyms

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

## General Information

<b>PIA Name:</b>	CDC - WTCHP - QTR2 - 2024 - CDC8309546	<b>PIA ID:</b>	1920599
<b>Name of Component:</b>	CDC - World Trade Center Health Program	<b>Name of ATO Boundary:</b>	World Trade Center Health Program
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	78
<b>Submission Status:</b>	Re-Submitted	<b>Submit Date:</b>	7/25/2024
<b>Next Assessment Date:</b>	08/28/2027	<b>Expiration Date:</b>	8/28/2027
<b>Office:</b>		<b>OPDIV:</b>	CDC
<b>Security Categorization:</b>	Moderate	<b>OpDiv PIA ID:</b>	CDC8309546
<b>Legacy PIA ID:</b>		<b>Make PIA available to Public?:</b>	Yes
<b>1:</b>	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
<b>2:</b>	Is this a FISMA-Reportable system?		Yes
<b>3:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
<b>4:</b>	ATO Date or Planned ATO Date.		9/2/2024
<b>5:</b>	Is the system or electronic information collection, agency or contractor operated?		Agency

## PTA

### PTA

<b>PTA - 2:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.	
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	Reauthorization
<b>PTA - 3:</b>	Is the data contained in the system owned by the agency or contractor?	Agency
<b>PTA - 4:</b>	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions.	The purpose of the World Trade Center Health Program system is to protect World Trade Center Health Program information for the medical coverage to the survivors of the September 11th tragedy and their beneficiaries as a result of the James Zadroga 9/11 Health and Compensation Act of 2010. This system is used as a central data repository to meets FISMA and HIPAA requirements for data related to conducting the designation of NIOSH OD that operates as the World Trade Center Health Program Administrator.

<b>PTA - 5:</b>	List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.	Record types include protected health information (PHI), personal identifiable information (PII), electronic health records, claims data, patient/disease registry data, health surveys, and administrative data.  WTCHP maintains names, email addresses, driver's license numbers, mailing/physical addresses, phone numbers, medical notes, date of birth (DOB), medical record numbers, Social Security Numbers (SSN), military and employment status, passport numbers and legal documents.
<b>PTA - 5A:</b>	Are user credentials used to access the system?	
<b>PTA - 5B:</b>	Please identify the type of user credentials used to access the system.	HHS User Credentials  HHS/OpDiv PIV Card
<b>PTA - 6:</b>	Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual.	World Trade Center Health Program (WTCHP) obtains PII voluntarily for billing, processing payments, tracking applicant status, research studies and eligibility determinations. World Trade Center Health Program records are obtained from individual applicants and enrollees, from medical providers who have treated eligible individuals, and from data centers that are repositories of demographic and medical information about World Trade Center responders and survivors. Enrollees voluntarily provide name, email address, and their phone number. This allows us to communicate with the users.  WTCHP maintains names, email addresses, driver's license numbers, mailing/physical addresses, phone numbers, medical notes, date of birth (DOB), Social Security Numbers (SSN), medical record numbers, military and employment status, passport numbers and legal documents.
<b>PTA - 7:</b>	Does the system collect, maintain, use or share PII?	Yes
<b>PTA - 7A:</b>	Does this include Sensitive PII as defined by HHS?	Yes
<b>PTA - 8:</b>	Does the system include a website or online application?	Yes
<b>PTA - 8A:</b>	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	Yes

<b>PTA - 9:</b>	Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response.	<p><a href="https://oasis.cdc.gov/">https://oasis.cdc.gov/</a></p> <p>OASIS is the Health Program online application website. It allows applicant to apply to become a member of the Health Program. It is available to the general public. They fill in a form and upload supporting documentation. Once they complete it, the form and the supporting documentation is forward onto the Health Program.</p> <p><a href="https://care.cdc.gov/">https://care.cdc.gov/</a></p> <p>The Centralized Accessible Real-Time Enterprise (CARE) system integrated member enrollment, claims, provider support and an enhanced reporting feature. The goal of this project is to integrate a Codebook which is based on a set of standards established by categories of disease and related conditions which serves as the foundation for how WTCHP members are certified to receive benefits and how the Program implements the limited healthcare model as required by the Zadroga Act. The current codebook process remains largely manual, utilizes multiple sources, and delays member claim processing time due to an inability access the current version in real time so that certification decisions can be processed sooner. The main goal of CARE is to provide real-time information to WTCHP staff and clinical partners to ensure that all member information is up-to-date and consistent throughout</p>
<b>PTA - 10:</b>	Does the website have a posted privacy notice?	Yes
<b>PTA - 11:</b>	Does the website contain links to non-federal government websites external to HHS?	No
<b>PTA - 11A:</b>	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
<b>PTA - 12:</b>	Does the website use web measurement and customization technology?	No
<b>PTA - 12A:</b>	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	
<b>PTA - 13:</b>	Does the website have any information or pages directed at children under the age of thirteen?	No
<b>PTA - 13A:</b>	Does the website collect PII from children under the age thirteen?	
<b>PTA - 13B:</b>	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
<b>PTA - 14:</b>	Does the system have a mobile application?	No
<b>PTA - 14A:</b>	Is the mobile application HHS developed and managed or a third-party application?	
<b>PTA - 15:</b>	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
<b>PTA - 16:</b>	Does the mobile application/ have a privacy notice?	
<b>PTA - 17:</b>	Does the mobile application contain links to non-federal government websites external to HHS?	

<b>PTA - 17A:</b>	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
<b>PTA - 18:</b>	Does the mobile application use measurement and customization technology?	
<b>PTA - 18A:</b>	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
<b>PTA - 19:</b>	Does the mobile application have any information or pages directed at children under the age of thirteen?	
<b>PTA - 19A:</b>	Does the mobile application collect PII from children under the age thirteen?	
<b>PTA - 19B:</b>	Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
<b>PTA - 20:</b>	Is there a third-party website or application (TPWA) associated with the system?	Yes
<b>PTA - 21:</b>	Does this system use artificial intelligence (AI) tools or technologies?	No

<b>PIA</b>		
<b>PIA</b>		
<b>PIA - 1:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Social Security Number Name Email Address Phone numbers Medical records (PHI) Military Status Date of Birth Mailing Address Medical Records Number Legal Documents Employment Status Passport Number Driver License Number Other - Free text Field - Medical History, Medical Treatment Codes, Medical Test Results, and Demographics
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Patients Members of the public
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	PII is obtained voluntarily for tracking applicant status, and eligibility determinations.

<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	<p>Secondary uses for PII allows qualified researchers to perform health surveillance and to conduct specialized analysis. This allows research studies to be performed for the WTCHP to provide better care for WTC responders through medical monitoring, treatment, cancer screening, and diagnostic evaluation.</p> <p>PII is also used to enable the WTCHP Administrator and the medical and scientific community to understand the impact of WTC exposure on the health of this cohort.</p>
<b>PIA - 6:</b>	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	SSN is used for billing, processing payments, tracking applicant status, and eligibility determinations.
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	The James Zadroga 9/11 Health and Compensation Act of 2010.
<b>PIA - 7:</b>	Identify legal authorities governing information use and disclosure specific to the system and program.	Public Health Service Act, Section 301, "Research and Investigation" (42 U.S.C. 241); Occupational Safety and Health Act, Section 20, "Research and Related Activities" (29 U.S.C. 669); the Federal Mine Safety and Health Act of 1977, Section 501, "Research" (30 U.S.C. 951) and the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA) (42 U.S.C.S. 7384, et seq.); and the Public Health Service Act, Title XXXIII, "World Trade Center Health Program" (42 U.S.C. §§ 300mm – 300mm-61).
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	Yes
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	<p>Social Security Number</p> <p>Phone Numbers</p> <p>Military Status</p> <p>Medical Records Number</p> <p>Employment Status</p> <p>Passport number</p> <p>Name</p> <p>Driver's License Number</p> <p>Email Address</p> <p>Date of Birth</p> <p>Mailing Address</p> <p>Medical Treatment Codes</p> <p>Demographics</p>

<b>PIA - 8B:</b>	Provide the number, title, and URL of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or indicate whether a new or revised SORN is in development.	09-20-0147, Occupational Health Epidemiological Studies and EEOICPA Program Records  <a href="#">Federal Register :: Privacy Act of 1974; System of Records</a>  Energy Employee Occupational Illness Compensation Program Act (EEOICPA)
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains  Hard Copy Mail/Fax  Phone  Email  Online  Government Sources Within the OPDIV Other HHS OPDIV  Non-Government Sources Members of the Public
<b>PIA - 10:</b>	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes
<b>PIA - 10A:</b>	Provide the information collection approval number.	0920-0891
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	9/30/2025
<b>PIA - 10C:</b>	Explain why an OMB information collection approval number is not required.	N/A; It was provided above.
<b>PIA - 11:</b>	Is the PII shared with other organizations outside the system's Operating Division?	Yes
<b>PIA - 11A:</b>	Identify with whom the PII is shared or disclosed.	Other Federal Agency/Agencies  Private Sector  Within HHS

PIA - 11B:

Please provide the purpose(s) for the disclosures described in PIA - 11A.

Administration of the Healthcare Program.

Public Health Service Act, Section 301, "Research and Investigation" (42 U.S.C. 241); Occupational Safety and Health Act, Section 20, "Research and Related Activities" (29 U.S.C. 669); the Federal Mine Safety and Health Act of 1977, Section 501, "Research" (30 U.S.C. 951) and the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA) (42 U.S.C.S. 7384, et seq.); and the Public Health Service Act, Title XXXIII, "World Trade Center Health Program" (42 U.S.C. §§ 300mm – 300mm-61).

If the WTC Health Program makes any changes to disclosures and/or data uses, a revised Notice of Privacy Practices will be made electronically available on the WTC Health Program website and it will be mailed to members WTC Health Program's next annual mailing. Individuals can also request to receive a copy of the current notice as described in the NOTICE OF PRIVACY PRACTICES FOR THE WORLD TRADE CENTER HEALTH PROGRAM <https://www.cdc.gov/wtc/privacy.html>.

The Privacy Notice received by the applicant advises them that if he/she believes that his/her privacy rights have been violated, they may file a complaint with the WTC Health Program by calling 1-888-982-4748, or by sending a letter to P.O. Box 7000 Rensselaer, NY 12144 ATTN: WTC Health Program, HIPAA Complaint. They are further advised that they may also file a complaint with the Department of Health and Human Services Office for Civil Rights by sending a letter to: 200 Independence Avenue, S.W., Washington, D.C. 20201, calling 1-877-696-6775, or visiting [www.hhs.gov/ocr/privacy/hipaa/complaints/](http://www.hhs.gov/ocr/privacy/hipaa/complaints/). TTY users should call 1-800-537-7697.

<b>PIA - 11C:</b>	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	<p>A Memorandum of Understanding (MOU) is an agreement between two or more parties outlined in a formal document. It is not necessarily legally binding, which depends on the signatories' intent and the language in the agreement, but signals the willingness of the parties to move forward with a contract.</p> <p>An Information Sharing Agreement (ISA) is a legal document that allows two or more parties to share, receive and use certain confidential information. These agreements are essential to protect intellectual property for all parties involved.</p> <p>A Data Use Agreement (DUA) is a required legal agreement that must be executed before there is any use, exchange, transfer, sharing, or disclosure of one or more limited or restricted datasets between the agreement parties</p> <p>ISA with Health Program Support vendor and the cost avoidance vendor</p> <p>IAA with Victims Compensation Fund (VCF)</p> <p>DUA with cost avoidance vendor and the health program support vendor and with</p> <p>MOU with Liberty Mutual</p> <p>MOU with CMS</p> <p>MOU with VCF</p> <p>MOU with DOJ</p> <p>MOU with New York City</p>
<b>PIA - 11D:</b>	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII. If no process or procedures are in place, please explain why not.	<p>Quality Assurance Surveillance Plan (QASP) is a Government surveillance plan used to define what the Government will do to ensure that contractor performance is executed in accordance with contract requirements and performance standards.</p> <p>QASPs measures for each vendor and quality control on all data.</p>
<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
<b>PIA - 12A:</b>	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
<b>PIA - 13:</b>	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	The potential claimants will fill out a voluntary eligibility worksheet at their local providers office voluntarily and can opt-out of the collection of PII with the Provider by not filling out the voluntary eligibility worksheet.

<p><b>PIA - 14:</b></p>	<p>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.</p>	<p>If the WTC Health Program makes any changes to disclosures and/or data uses, a revised Notice of Privacy Practices will be made electronically available on the WTC Health Program website, and it will be mailed to members WTC Health Program's next annual mailing. Individuals can also request to receive a copy of the current notice as described in the:</p> <p>NOTICE OF PRIVACY PRACTICES FOR THE WORLD TRADE CENTER HEALTH PROGRAM  <a href="https://www.cdc.gov/wtc/privacy.html">https://www.cdc.gov/wtc/privacy.html</a></p>
<p><b>PIA - 15:</b></p>	<p>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.</p>	<p>The Privacy Notice received by the applicant advises them that if he/she believes that his/her privacy rights have been violated, they may file a complaint with the WTC Health Program by calling 1-888-982-4748, or by sending a letter to P.O. Box 7000 Rensselaer, NY 12144 ATTN: WTC Health Program, HIPAA Complaint. They are further advised that they may also file a complaint with the Department of Health and Human Services Office for Civil Rights by sending a letter to: 200 Independence Avenue, S.W., Washington, D.C. 20201, calling 1-877-696-6775, or visiting <a href="http://www.hhs.gov/ocr/privacy/hipaa/complaints/">www.hhs.gov/ocr/privacy/hipaa/complaints/</a>. TTY users should call 1-800-537-7697.</p>
<p><b>PIA - 16:</b></p>	<p>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.</p>	<p>The System Administrator continuously monitors the replication of files and file server data for integrity, availability, and accuracy. The WTCHP Quality Assurance team continuously monitors the WTCHP PII data for integrity, availability, accuracy and relevancy. Multiple vendors send information to a central database. This information updates any outdated information that may be in the database. CDC/NIOSH/WTCHP then reviews and adds additional information to the PII. This is done on a weekly basis.</p>
<p><b>PIA - 17:</b></p>	<p>Identify who will have access to the PII in the system.</p>	<p>Users Administrators Contractors</p>
<p><b>PIA - 17A:</b></p>	<p>Select the type of contractor.</p>	<p>HHS/OpDiv Direct Contractors</p>
<p><b>PIA - 17B:</b></p>	<p>Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?</p>	<p>Yes</p>
<p><b>PIA - 18:</b></p>	<p>Provide the reason why each of the groups identified in PIA - 17 needs access to PII.</p>	<p>USERS: To protect World Trade Center Health Program information for the medical coverage to the survivors of the September 11th tragedy and their beneficiaries as a result of the James Zadroga 9/11 Health and Compensation Act of 2010.</p> <p>ADMIN: Troubleshooting and system updates.</p> <p>CONTRACTORS: Direct contractors serving as administrators.</p>

<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	<p>The system owner determines access to the system. The system owner coordinates with the unit chiefs and senior leadership to decide what users need access to PII. Access to PII is granted on a least privilege and role based basis. Business units must submit a request to the system owner with a justification for users needing access to PII. The system owner then reviews the request and determines need to know and right to know.</p> <p>Multifactor authentication is used to identify the user, accounts are then authorized by Active Directory</p>
<b>PIA - 20:</b>	Describe the technical methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.	Least privilege and Role Based Access Control (RBAC) are implemented to limit access to PII. Multifactor authentication is used to identify the user, accounts are then authorized by Active Directory.
<b>PIA - 21:</b>	Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.	All personnel with access to the system complete CDC Annual Security Awareness Training.
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	The users also receive HIPAA training on an annual basis.
<b>PIA - 23:</b>	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).	<p>Records are retained and disposed in accordance with CDC Electronic Records Control Schedule for NIOSH records. Research records are maintained in the agency for three years after close of the study. WTC Health Program records are transferred to Federal Records Center 15 years after the case file becomes inactive and are destroyed after 75 years.</p> <p>Paper files that have been scanned to create electronic copies are disposed of after the copies are verified. Disposal methods include erasing computer tapes and burning or shredding paper material.</p> <p>Records Retention Schedule: GENERAL RECORDS SCHEDULE 4.3: Input Records, Output Records, and Electronic Copies.</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.

Administrative controls: A database software security package is utilized to control unauthorized access to the system. Access is granted to only a limited number of physicians, scientists, and designated support staff, as authorized by the system manager, to accomplish the stated purposes for which the data in this system has been collected.

Physical controls: Hard copy records are kept in locked cabinets in locked rooms. Guard services in the buildings provides screening of visitors and personnel. The limited access, secured computer room contains fire extinguishers and an overhead sprinkler system. Computer workstations and automated records are located in secured areas. Electronic anti-intrusion devices are in operation at the Federal Records Center.

Technical controls: Data sets are password protected and/or encrypted. Protection for computerized records both on the mainframe and the NIOSH Local Area Network (LAN) includes programmed verification of valid user identification code and password prior to logging onto the system, mandatory password changes, limited-login attempts, virus protection, and user rights/file attribute restrictions. Password protections imposes user name and password login requirements to prevent unauthorized access. Each user name is assigned limited access rights to files and directories at varying levels to control file sharing. There are routine daily backup procedures and secure off-site storage is available for backup tapes.

### Review & Comments

#### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	7/25/2024
<b>Privacy Analyst Comments:</b>	OpDiv Analyst: Joshua Mosios (Contractor)	<b>Privacy Analyst Days Open:</b>	

#### SOP Review

<b>SOP Review Status:</b>	Approved	<b>SOP Signature:</b>	
<b>SOP Comments:</b>	Approved on behalf of Beverly Walker	<b>SOP Review Date:</b>	8/7/2024
		<b>SOP Days Open:</b>	13

## Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	8/9/2024
<b>Agency Privacy Analyst Review Comments:</b>	<p>Reviewer: Nestor Villafuerte</p> <p>8/9/2024 CDC resubmitted this PIA and while they remove the financial information from PTA-4 and PTA-5 it is mentioned in PTA-6. However, we're going to push this PIA for SAOP review and approval.</p> <p>7/18/2024 Per CDC email, we confirm that the ATO is 9/3/2021 and expire 9/2/2024 and that individuals login and authenticate via SAMS and AD. However, CDC recommend rejecting the PIA to get clarification on the financial information question:</p> <p>Reviewer noted PTA-5 and PIA-4 mentioned that PII is used for billing and processing payments. What type of financial information is used for billing and processing payments? Specifically does the system collect credit card information, account number, and routing number, etc.</p>	<b>Agency Privacy Analyst Days Open:</b>	2

## SAOP Review

<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	Archer Signature_Bridget Guenther.docx
<b>SAOP Comments:</b>	<p>There are a number of updates that need to be made for the next iteration. Once the PTA fix is implemented, I recommend CDC make these corrections so the PTA and PIA are consistent:</p> <p>8/9/2024 CDC resubmitted this PIA and while they remove the financial information from PTA-4 and PTA-5 it is mentioned in PTA-6. However, we're going to push this PIA for SAOP review and approval.</p> <p>7/18/2024 Per CDC email, we confirm that the ATO is 9/3/2021 and expire 9/2/2024 and that individuals login and authenticate via SAMS and AD. However, CDC recommend rejecting the PIA to get clarification on the financial information question:</p> <p>Reviewer noted PTA-5 and PIA-4 mentioned that PII is used for billing and processing payments. What type of financial information is used for billing and processing payments? Specifically does the system collect credit card information, account number, and routing number, etc.</p>	<b>SAOP Review Date:</b>	8/28/2024
		<b>SAOP Days Open:</b>	19

## Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
7-18-2024 Email_CDC - WTCHP - QTR2 - 2024 - CDC8309546.pdf	219110	.pdf	7/18/2024 4:02 PM	2

## Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 11C	Data Feed Service, piafrmcdc	6/18/2024	Cite any actual agreement.	
PIA - 11B	Data Feed Service, piafrmcdc	6/18/2024	Provide a distinct justification for each category selected in 11A.	
PIA - 11D	Data Feed Service, piafrmcdc	6/18/2024	Define QASP	
PIA - 18	Data Feed Service, piafrmcdc	6/18/2024	Label role for each selected in 17	
PIA - 8B	Data Feed Service, piafrmcdc	7/16/2024	Provide the correct name for the HHS/CDC SORN, not the name of the Act.	
PIA - 8A	Data Feed Service, piafrmcdc	7/16/2024	Include all pii data elements in the list of PII above	
PIA - 11C	Data Feed Service, piafrmcdc	7/16/2024	Have all acronyms been defined?	
PIA - 1	VILLAFUERTE, NESTOR	7/17/2024	Reviewer notes that there is no ATO date posted and that PTA-2 failed to sync.  PTA-4 Please define the following acronyms on their first instance: FIAMS, HIPAA, NIOSH OD.	
PIA - 1	BLAND, CRYSTAL	7/18/2024	In regards to the previous comment, on the next iteration of the PTA:  We noted that the ATO Date was 6/28/2024 and the PIA is being resubmitted for reauthorization.  PTA-2: response should be "PIA Validation (PIA Refresh) per comment and response from PTA viewed on the component side.  PTA-5: Reviewer noted in the comment section that SAMS is mentioned does this system use SAMS for access control and authentication? If so, please include in PTA-5 response.  PTA-5A: if system uses SAMS then select "Yes, but user credentials are maintained by another system." If not, and user credentials are used	

and maintained by this system select "Yes" and respond in PTA-5B. If no user credentials are used then select "No."

PIA - 1	BLAND, CRYSTAL	7/18/2024	PTA-5 and PIA-4 mentioned that PII is used for billing and processing payments but financial information is not selected in PIA-1.  Nor is the type of financial information mentioned in PTA-5.
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### Admin Section

Is OpDiv Privacy Analyst Approved ?:	1	Is OpDiv Privacy Analyst Return ? :	0
Is Agency Privacy Analyst Approve ?:	1	Is SOP Return ?:	0
Is SAOP Approved?:	1	Is Agency Privacy Analyst Return ?:	0
Total Approved:	4	Is SAOP Return ?:	0
Total Approval Required:	4	Total Return:	0

### Miscellaneous Fields

Last Updated:	8/28/2024 8:01 PM	History Log:	<a href="#">View History Log</a>
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