## 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

| **Does this need to migrate to a Sub-Component?:** | No |

## Consolidated Parent Component

| Component Name |
| --- |
| No Records Found |

## General Information

| | | | |
|---|---|---|---|
| **PIA Name:** | CDC - OCIO ISB INFR SVCS - Vessel Sanitation Program - QTR2 - 2024 - CDC8252187 | **PIA ID:** | 8252187 |
| **Name of Component:** | OCIO ISB Infrastructure Services | **Name of ATO Boundary:** | OCIO ISB Infrastructure Services |

### Migrated Sub-Component PIA

**PIA Name**

No Records Found

### Sub-Component

**Software Name**

Vessel Sanitation Program

### Original Related PIA ID

**PIA Name**

CDC - VSP - QTR2 - 2023 - CDC6757208

| | | | |
|---|---|---|---|
| **Overall Status:** | ✅ | **PIA Queue:** | |
| **Submitter:** | BOATENG, Alfred | **# Days Open:** | (289) |
| **Submission Status:** | Re-Submitted | **Submit Date:** | 6/21/2023 |
| **Next Assessment Date:** | 07/24/2026 | **Expiration Date:** | 7/24/2026 |
| **Office:** | OD | **OpDiv:** | CDC |
| **Security Categorization:** | | | |
| **Legacy PIA ID:** | | **Make PIA available to Public?:** | Yes |
| **1:** | Identify the Enterprise Performance Lifecycle Phase of the system | | |
| **2:** | Is this a FISMA-Reportable system? | | |
| **3:** | Does the system have or is it covered by a Security Authorization to Operate (ATO)? | | |
| **4:** | ATO Date or Planned ATO Date | | 7/17/2023 |

### Privacy Threshold Analysis (PTA)

**PTA Name**

CDC - OCIO ISB INFR SVCS - Vessel Sanitation Program - QTR2 - 2024 - CDC8252070

| | |
|---|---|
| **History Log:** | **View History Log** |

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## 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. | No changes |
| **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. | The purpose of the system is to aid in reporting on inspections of cruise ships and to collect and report on any gastrointestinal illness outbreaks on said ships. Prior to this system, inspections were tracked on paper. The system eliminates paper both in the field and on site at CDC, greatly improving inspector efficiency in data collection and tracking. |
|---|---|---|
| | | Additionally, the system provides the ability for cruise ships to submit GI reports via email or through a web site, and have quick response time regarding the acceptance and processing of said reports. Neither of these abilities were available when using paper forms, so the end user experience has been significantly enhanced. |
| | | The system is also used to study trends, via aggregate data, regarding disease outbreaks on cruise ships. |
| 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 collects, maintains, and shares the following types of information: |
| | | Reports (date, ship name, cruise line name, number of cases, types of illness,cruise dates, numbers of passengers and crew on each voyage, numbers of ill passengers and crew on each voyage, and anonymous dates of illness onset for each GI case in an outbreak) <br> Inspections (inspection scores, inspection violations, inspector recommendations for correction of violations) <br> Invoices (ship name, amount, date) <br> Ship Contacts (name, mailing address, email address, phone number) |
| | | Internal users are authenticated by active directory, a CDC authorized system. Active Directory is a separate system with its own PIA. External users are authenticated by username and password. |
| 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. | The Vessel Sanitation Program (VSP) system is used by CDC inspectors to record scores, violations, and recommendations for correction of violations on cruise ships and by cruise ships to report incidence of gastrointestinal infections. The vessel's captain may report findings by fax, telephone, web site, and/or by email to a dedicated VSP mailbox. The system also posts the inspection information and reports on the VSP public website. |
| --- | --- | --- |
| | | The system collects, maintains, and shares the following types of information: |
| | | Reports (date, ship name, cruise line name, number of cases, types of illness, cruise dates, numbers of passengers and crew on each voyage, numbers of ill passengers and crew on each voyage, and anonymous dates of illness onset for each GI case in an outbreak)<br>Inspections (inspection scores, inspection violations, inspector recommendations for correction of violations)<br>Invoices (ship name, amount, date)<br>Ship Contacts (name, mailing address, email address, phone number) |
| | | Reports and inspection information are needed to assess whether ships are adequately protecting passengers from gastrointestinal diseases. The report information is collected from cruise ship employees on any vessel that has a foreign itinerary and carries 13 or more passengers and calls on a U.S. port. CDC inspectors collect the inspection information. Reports and inspection information is shared with the public on the VSP website. |
| | | Ship contact information is provided to CDC by the cruise lines. It is used to create invoices for ship inspections and to contact each ship. Ship contact information is about cruise ship employees (18 and older) and is not shared. |
| | | Internal users are authenticated by active directory, a CDC authorized system. Active Directory is a separate system with its own PIA. External users are authenticated by username and password. |
| **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)? | Yes |

| 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. | http://midrs.cdc.gov/admin/midrsmanagement.aspx is CDC only web address for the login for the administrative users for the system. |
| --- | --- | --- |
| | | https://wwwn.cdc.gov/midrs/GILogin.aspx is the web address for the log in page where cruise ships with credentials can self report gastrointestinal incidents. |
| | | https://wwwn.cdc.gov/InspectionQueryTool/InspectionSearch.aspx is the web address for the publicly available web page providing access to ship inspection scores. |
| | | https://www.cdc.gov/nceh/vsp is the publicly available home page for the Vessel Sanitation Program (VSP). |
| PTA - 10: | Does the website have a posted privacy notice? | Yes |
| PTA - 11: | Does the website contain links to non-federal government websites external to HHS? | No |
| PTA - 11A: | Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS? | |
| PTA - 12: | Does the website use web measurement and customization technology? | No |
| PTA - 12A: | Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII. | |
| PTA - 13: | Does the website have any information or pages directed at children under the age of thirteen? | No |
| PTA - 13A: | Does the website collect PII from children under the age thirteen? | No |
| PTA - 13B: | Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected? | |
| PTA - 14: | Does the system have a mobile application? | No |
| PTA - 14A: | Is the mobile application HHS developed and managed or a third-party application? | |
| PTA - 15: | Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response. | |
| PTA - 16: | Does the mobile application/ have a privacy notice? | |
| PTA - 17: | Does the mobile application contain links to non-federal government website external to HHS? | |
| PTA - 17A: | Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS? | |
| PTA - 18: | Does the mobile application use measurement and customization technology? | |
| PTA - 18A: | Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected. | |
| PTA - 19: | Does the mobile application have any information or pages directed at children under the age of thirteen? | |
| PTA - 19A: | Does the mobile application collect PII from children under the age thirteen? | |
| PTA - 19B: | Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected? | |

| PTA - 20: | Is there a third-party website or application (TPWA) associated with the system? | No |
|---|---|---|
| PTA - 21: | Does this system use artificial intelligence (AI) tools or technologies? | No |

## PIA

### PIA

| PIA - 1: | Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share. | Name<br>Email Address<br>Phone numbers<br>Mailing Address |
|---|---|---|
| PIA - 2: | Indicate the categories of individuals about whom PII is collected, maintained or shared. | Members of the public |
| 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? | VSP contacts members (Name) of the cruise ship industry via Phone Number, Email Address, and regular Mail address regarding various business matters those members conduct with VSP. |
| PIA - 5: | Describe any secondary uses for which the PII will be used (e.g. testing, training or research). | VSP has no secondary use of PII. |
| PIA - 6: | Describe the function of the SSN and/or Taxpayer ID. | VSP does not collect SSN. |
| PIA - 6A: | Cite the legal authority to use the SSN. | VSP does not collect SSN. |
| PIA - 7: | Identify legal authorities, governing information use and disclosure specific to the system and program. | Public Health Service Act 42 CFR § 71.21 - Report of death or illness. 5 U.S.C. \| Executive Orders 9397,1302, 2951, 3301, 3372, 4118, 8347 as amended by 13478, 9830, and 12107 |
| 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. | Directly from an individual about whom the information pertains<br>  Email<br>Non-Government Sources<br>  Members of the Public<br>  Private Sector |
| PIA - 10: | Is there an Office of Management and Budget (OMB) information collection approval number? | Yes |
| PIA - 10A: | Provide the information collection approval number. | OMB Control No. 0920-1260, expiration date 03/31/2026 |
| PIA - 10B: | Identify the OMB information collection approval number expiration date. | 3/31/2026 |
| PIA - 10C: | Explain why an OMB information collection approval number is not required. | OMB Control No. 0920-1260 |

| 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<br><br>Within HHS |
| PIA - 11B: | Please provide the purpose(s) for the disclosures described in PIA - 11A. | Sometimes people within HHS have questions regarding the cruise line industry that can only be answered by members of that industry, so VSP will share the business contact information for that purpose.<br><br>There are times that people in other agencies have questions regarding the cruise line industry that can only be answered by members of that industry, so VSP will share the business contact information for that purpose. |
| PIA - 11C: | List any agreements in place that authorize the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)). | The system does not disclose PII. Therefore, no agreements are in place. |
| 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. | None |
| 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. | None |
| PIA - 13: | Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason. | Individuals may opt out of the collection or use of their PII by not providing PII to VSP. If they opt out, they will lose access to the system and will not be able to provide information to VSP. However, they will still be able to access public information on the VSP website. |
| 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. | Individuals are sent notifications by email if major changes occur to the system. |
| 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. | If an individual believes that their PII has been inappropriately obtained, used, or disclosed or they believe their PII is inaccurate, the process for redress is the same.<br>The issue is handled by the Branch Chief.<br>The individual may contact the VSP via the vsp@cdc.gov email address with any and all concerns, and an admin will forward the email to the Branch Chief for action.<br>The Branch Chief will investigate the issue and determine whether or not the individual's concern is valid, take appropriate action to redress the concern if there is a problem, and notify the individual by email of the results. |

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| **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. | The VSP Chief or designee conducts an annual review of PII by examining each individual's PII. The Chief reviews the information per the criteria below and updates or deletes PII as necessary:<br><br>Only those records which are relevant and necessary to accomplish the system's purpose as required by statute are retained;<br>All records used to make a determination about an individual are verified to be sufficiently accurate, relevant, timely, and complete to make;<br><br>Note that no records are disclosed outside the federal government.<br><br>Also note that the records are not governed by a Computer Matching Agreement. |
| **PIA - 17:** | Identify who will have access to the PII in the system. | Administrators<br><br>Developers<br><br>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. | For creating reports that are sent to the contacts. The VSP Chief, as an administrator, pulls PII from the system as needed to provide business contact details to HHS personnel and other federal agencies.<br><br>In development and testing of the application software, the developer will sometimes need to view PII to verify or enhance functionality.<br><br>Only direct contractors have access to the information. Contractors are used exclusively for development of the software applications, therefore they fulfill the Developer role described above: In development and testing of the application software, the developer will sometimes need to view PII to verify or enhance functionality. |

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| **PIA - 19:** | Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII. | It is the job function of administrators to send invoices and correspond with individuals whose PII is stored in VSP systems. Therefore, it is inherent in assigning staff to the administrator role that they have access to PII. The Chief makes the determination of who receives the administrator role based on the workload of the VSP group. Developers are required by VSP to maintain and enhance VSP software applications, and to maintain the database of PII. Developers cannot perform their role without incidental exposure to PII and, in some cases, direct exposure when software errors or enhancements require it. The VSP Chief determines which individuals receive the developer role based on needs of the group. Contractors comprise the entirety of the developer role. Therefore, their access to PII is determined by the same methodology detailed above for the developer role. |
| **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. | The VSP Chief grants individual VSP staff access to software applications based on their need to perform a specific job function. Those who need access are assigned to an Active Directory account whose sole purpose is to limit access to VSP applications. The combination of a PIV card and membership in the Active Directory group limit access to PII. |
| **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 VSP personnel undergo Security Awareness Training as provided by CDC. Training is refreshed annually. |
| **PIA - 22:** | Describe 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). | The VSP Chief reviews PII during the 3rd quarter of each fiscal year. Contact information that is outdated is removed at that time per GRS 1.1-011 for financial records, which indicates record destruction is to take place when records are no longer needed. This schedule is used because the PII is related to invoicing. |

| **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. | The administrative controls educate system users of their responsibility to protect PII and legally bind them to do so. These controls include signed rules of behavior , non-disclosure agreements, CDC privacy and security awareness training, and records management training. Records are maintained according to CDC record control policies and procedures.<br><br>The technical controls, implemented by the system, act to either allow access to system PII data only to approved users or to make PII data unreadable outside of the system. These controls include encryption, authentication, firewalls, intrusion detection systems, and anti-malware systems.<br><br>The physical controls, implemented by the system, restrict access to CDC buildings and areas housing computers used by this system. These controls include guards, identification badges, key cards, locked doors, cipher locks, fences, alarms and closed circuit TV. |

| Review & Comments | | | |
|---|---|---|---|

### Privacy Analyst Review

| OpDiv Privacy Analyst Review Status: | Approved | Privacy Analyst Review Date: | 6/28/2023 |
|---|---|---|---|
| Privacy Analyst Comments: | | Privacy Analyst Days Open: | |

### SOP Review

| SOP Review Status: | Approved | SOP Signature: | JWO Signature.docx |
|---|---|---|---|
| SOP Comments: | | SOP Review Date: | 6/29/2023 |
| | | SOP Days Open: | 8 |

### Agency Privacy Analyst Review

| Agency Privacy Analyst Review Status: | Approved | Agency Privacy Analyst Review Date: | 7/25/2023 |
|---|---|---|---|
| Agency Privacy Analyst Review Comments: | In the next iteration of the PTA, please spell out GI in PTA-4 | Agency Privacy Analyst Days Open: | 26 |

### SAOP Review

| SAOP Review Status: | Approved | SAOP Signature: | |
|---|---|---|---|
| SAOP Comments: | Approved on behalf of Bridget Guenther<br><br>In the next iteration of the PTA, please spell out GI in PTA-4 | SAOP Review Date: | 7/25/2023 |
| | | SAOP Days Open: | 0 |

### Supporting Document(s)

| Name | Size | Type | Upload Date | Downloads |
|---|---|---|---|---|
| NOA 0920-1260 Rev 2023_OMB.pdf | 100017 | .pdf | 5/9/2024 7:15 PM | 0 |

### Comments

| Question Name | Submitter | Date | Comment | Attachment |
|---|---|---|---|---|
| PIA - 10A | BANKS, Quentin | 5/19/2023 | Please confirm the expiration date as the one given has already expired. | |
| PIA - 10B | BANKS, Quentin | 5/19/2023 | Please confirm the expiration date as the one given has already expired. | |
| PIA - 20 | OSHODI, Jarell | 6/20/2023 | What does AD stand for? | |