



USAID
FROM THE AMERICAN PEOPLE

Staff Care Wellness Privacy Impact Assessment (PIA)

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

Office of the Chief Information Officer (M/CIO)
Information Assurance Division
HHS/FOH/Staff Care Wellness
Approved Date: July 30, 2014

Additional Privacy Compliance Documentation Required:

- None
- System of Records Notice (SORN)
- Open Data Privacy Analysis (ODPA)
- Privacy Act Section (e)(3) Statement or Notice (PA Notice)
- USAID Web Site Privacy Policy
- Privacy Protection Language in Contracts and Other Acquisition-Related Documents
- Role-Based Privacy Training Confirmation

Possible Additional Compliance Documentation Required:

- USAID Forms Management. [ADS 505](#)
- Information Collection Request (ICR). [ADS 505](#), [ADS 506](#), and [ADS 508 Privacy Program](#)
- Records Schedule Approved by the National Archives and Records Administration. [ADS 502](#)

Table of Contents

1	<i>Introduction</i>	1
2	<i>Information</i>	1
2.1	Program and System Information.....	1
2.2	Information Collection, Use, Maintenance, and Dissemination.....	4
3	<i>Privacy Risks and Controls</i>	6
3.1	Authority and Purpose (AP).....	6
3.2	Accountability, Audit, and Risk Management (AR).....	7
3.3	Data Quality and Integrity (DI).....	8
3.4	Data Minimization and Retention (DM).....	8
3.5	Individual Participation and Redress (IP).....	9
3.7	Transparency (TR).....	9
3.8	Use Limitation (UL).....	10
3.9	Third-Party Web Sites and Applications.....	10

1 Introduction

The USAID Privacy Office is using this Privacy Impact Assessment (PIA) Template to gather information from program managers, system owners, and information system security officers in order to analyze USAID information technology and information collections (systems) that collect, use, maintain, or disseminate personally identifiable information (PII). See [ADS 508 Privacy Program](#) Section 503.3.5.2 Privacy Impact Assessments.

2 Information

2.1 Program and System Information

2.1.1 Describe the PROGRAM and its PURPOSE.

PII supplied by employee is information that is used to assist clients with living a healthy life style, including by tailoring information sent via e-mail newsletters and tracking progress against health-related goals. Information includes name, e-mail address, birthdate, and information about life style and health status. In some cases employees will create an identifier for initial login purposes.

2.1.2 Describe the SYSTEM and its PURPOSE.

Via Interagency Agreement A161687, FOH has been under contract with USAID since 2011 to provide a variety of wellness and occupational health services. The most recent version of this agreement was negotiated with Bernadette Mitchell and was signed and accepted by Elizabeth Kolmstetter. Statement of Work S168428, which defines support to be provided for the H30 USAID Wellness Health Promotion Program defines the explicit scope of services.

As defined in the statement of work between USAID and FOH agencies, a key part of the FOH health promotion services is to provide USAID employees with "access to an online Health Risk Assessment (HRA) tool. The HRA tool is provided via a secure Internet web site that allows interested staff to access the web site and set up an account. Once user set up an account, they can answer a survey about their health status. Responses to this survey allow the system to identify potential health risks and identify activities or lifestyle changes that the person could make to improve their wellness. Once the HRA survey is complete, the enrolled staff can gain access to content about the health and wellness issues that are relevant to them. The site also provides them with tools to track progress on proposed actions, and it can provide the enrolled members with routine messages to keep them aware and help remind them about the activities or lifestyle changes they could perform.

If enrolled members feel they need more support than the self-help and automated emails, they may opt-in to receive routine coaching. In the process of opting into this, members are informed that this means they will be sharing their information with a lifestyle coach. If they do opt in, they will have teleconferences with the coach who has access to the information the person is inputting in to the system to help track and encourage their progress towards goals.

2.1.3 What is the SYSTEM STATUS?

- New System Development or Procurement
- Pilot Project for New System Development or Procurement
- Existing System Being Updated
- Existing Information Collection Form or Survey
OMB Control Number:
- New Information Collection Form or Survey
- Request for Dataset to be Published on an External Website
- Other:

2.1.4 What types of INFORMATION FORMATS are involved with the program?

- Physical only
- Electronic only
- Physical and electronic combined

2.1.5 Does your program participate in PUBLIC ENGAGEMENT?

- No. (Government employees must sign Rules of Behavior and accept the Privacy Notice via the .gov in order to authenticate and keep information out of public use.)
- Yes:
 - Information Collection Forms or Surveys
 - Third Party Web Site or Application (The program engages with Agency customers and then to Agency employees. HRA-Motivation is a contractor-supplied web portal.)
 - Collaboration Tool

2.1.6 What type of system and/or TECHNOLOGY is involved?

- Infrastructure System (Local Area Network, Wide Area Network, General Support System, etc.)
- Network
- Database
- Software
- Hardware
- Mobile Application or Platform
- Mobile Device Hardware (cameras, microphones, etc.)
- Quick Response (QR) Code (matrix geometric barcodes scanned by mobile devices)
- Wireless Network

2.1.6 What type of system and/or TECHNOLOGY is involved?
<input type="checkbox"/> Social Media
<input type="checkbox"/> Web Site or Application Used for Collaboration with the Public
<input type="checkbox"/> Advertising Platform
<input type="checkbox"/> Website or Webserver
<input checked="" type="checkbox"/> Web Application
<input checked="" type="checkbox"/> Third-Party Website or Application
<input type="checkbox"/> Geotagging (locational data embedded in photos and videos)
<input type="checkbox"/> Near Field Communications (NFC) (wireless communication where mobile devices connect without contact)
<input type="checkbox"/> Augmented Reality Devices (wearable computers, such as glasses or mobile devices, that augment perception)
<input type="checkbox"/> Facial Recognition
<input type="checkbox"/> Identity Authentication and Management
<input type="checkbox"/> Smart Grid
<input type="checkbox"/> Biometric Devices
<input type="checkbox"/> Bring Your Own Device (BYOD)
<input type="checkbox"/> Remote, Shared Data Storage and Processing (cloud computing services)
<input type="checkbox"/> Other:
<input type="checkbox"/> None

2.1.7 About what types of people do you collect, use, maintain, or disseminate personal information?
<input type="checkbox"/> Citizens of the United States
<input type="checkbox"/> Aliens lawfully admitted to the United States for permanent residence
<input checked="" type="checkbox"/> USAID employees and personal services contractors
<input type="checkbox"/> Employees of USAID contractors and/or services providers
<input type="checkbox"/> Aliens
<input type="checkbox"/> Business Owners or Executives
<input type="checkbox"/> Others:
<input type="checkbox"/> None

2.2 Information Collection, Use, Maintenance, and Dissemination

2.2.1 What types of personal information do you collect, use, maintain, or disseminate?
<input checked="" type="checkbox"/> Name, Former Name, or Alias
<input type="checkbox"/> Mother's Maiden Name
<input type="checkbox"/> Social Security Number or Truncated SSN
<input checked="" type="checkbox"/> Date of Birth
<input type="checkbox"/> Place of Birth
<input type="checkbox"/> Home Address
<input type="checkbox"/> Home Phone Number
<input checked="" type="checkbox"/> Personal Cell Phone Number
<input type="checkbox"/> Personal E-Mail Address
<input checked="" type="checkbox"/> Work Phone Number
<input checked="" type="checkbox"/> Work E-Mail Address
<input type="checkbox"/> Driver's License Number
<input type="checkbox"/> Passport Number or Green Card Number
<input type="checkbox"/> Employee Number or Other Employee Identifier
<input type="checkbox"/> Tax Identification Number
<input type="checkbox"/> Credit Card Number or Other Financial Account Number
<input type="checkbox"/> Patient Identification Number
<input type="checkbox"/> Employment or Salary Record
<input checked="" type="checkbox"/> Medical Record (Users may enter medical history as well as information about current conditions.)
<input type="checkbox"/> Criminal Record
<input type="checkbox"/> Military Record
<input type="checkbox"/> Financial Record
<input checked="" type="checkbox"/> Education Record (In broad terms, such as level of education.)
<input type="checkbox"/> Biometric Record (signature, fingerprint, photo, voice print, physical movement, DNA marker, retinal scan, etc.)
<input checked="" type="checkbox"/> Sex or Gender
<input checked="" type="checkbox"/> Age

2.2.1 What types of personal information do you collect, use, maintain, or disseminate?
<input checked="" type="checkbox"/> Other Physical Characteristic (eye color, hair color, height, tattoo) (Users' height, weight, and health assessments information)
<input type="checkbox"/> Sexual Orientation
<input checked="" type="checkbox"/> Marital status or Family Information (Broad questions: Are you married? Are you in a long-term relationship?)
<input type="checkbox"/> Race or Ethnicity
<input type="checkbox"/> Religion
<input type="checkbox"/> Citizenship
<input checked="" type="checkbox"/> Other: (Personal identifier upon login setup)
<input type="checkbox"/> No PII is collected, used, maintained, or disseminated

2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?
<input checked="" type="checkbox"/> Log Data (IP address, time, date, referrer site, browser type)
<input type="checkbox"/> Tracking Data (single- or multi-session cookies, beacons)
<input checked="" type="checkbox"/> Form Data
<input checked="" type="checkbox"/> User Names
<input checked="" type="checkbox"/> Passwords (to access the site)
<input checked="" type="checkbox"/> Unique Device Identifier (requesting IP addresses in web logs)
<input type="checkbox"/> Location or GPS Data
<input type="checkbox"/> Camera Controls (photo, video, videoconference)
<input type="checkbox"/> Microphone Controls
<input type="checkbox"/> Other Hardware or Software Controls
<input type="checkbox"/> Photo Data
<input type="checkbox"/> Audio or Sound Data
<input type="checkbox"/> Other Device Sensor Controls or Data
<input type="checkbox"/> On/Off Status and Controls
<input type="checkbox"/> Cell Tower Records (logs, user location, time, date)
<input checked="" type="checkbox"/> Data Collected by Apps (itemize): Personal contact information for email. Medical history information and current conditions, medications, eating and exercise habits, and lifestyle choices (smoking, drinking, and risky behavior habits).

2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?

- Contact List and Directories
- Biometric Data or Related Data
- SD Card or Other Stored Data
- Network Status
- Network Communications Data
- Device Settings or Preferences (security, sharing, status)
- Other:
- None

2.2.4 Who owns and/or controls the system involved?

- USAID Office:
- Another Federal Agency: HHS Federal Occupational Health
- Contractor:
- Cloud Computing Services Provider:
- Third-Party Website or Application Services Provider:
- Mobile Services Provider:
- Digital Collaboration Tools or Services Provider:
- Other:

3 Privacy Risks and Controls

3.1 Authority and Purpose (AP)

3.1.1 What are the statutes or other LEGAL AUTHORITIES that permit you to collect, use, maintain, or disseminate personal information?

Listed within the Interagency Agreement with FOH HHS are the statute citations. The Agreement is #A161687.

3.1.2 Why is the PII collected and how do you use it?

PII supplied by an employee is used to assist the employee with living a healthy life style, including tailoring information sent via e-mail newsletters and tracking progress against health-related goals. Employees can opt-in to work with a coach.

3.1.3 How will you identify and evaluate any possible new uses of the PII?

The only information collected is what is listed within the scope of the SORN: OPM GOV-10.

3.2 Accountability, Audit, and Risk Management (AR)

3.2.1 Do you use any data collection forms or surveys?

No:

Yes:

Form or Survey (Please attach)

OMB Number, if applicable:

Privacy Act Statement (Please provide link or attach PA Statement)

3.2.3 Who owns and/or controls the personal information?

USAID Office: USAID owns the information, but FOH is the custodian during the time of the agreement. The information is part of the official employee medical record. After the conclusion of employment, per the SORN, records are archived with NARA and go to OPM.

Another Federal Agency:

Contractor:

Cloud Computing Services Provider:

Third-Party Web Services Provider:

Mobile Services Provider:

Digital Collaboration Tools or Services Provider:

Other:

3.2.8 Do you collect PII for an exclusively statistical purpose? If you do, how do you ensure that the PII is not disclosed or used inappropriately?

No. Although there will be management reports and health demographics at the aggregate population level for the decreasing or improving health trends.

Yes:

3.3 Data Quality and Integrity (DI)

3.3.1 How do you ensure that you collect PII to the greatest extent possible directly from the subject individual?

Employees enter their own data, and the data provided is voluntary.

3.3.2 How do you ensure, to the greatest extent possible, that the PII is accurate, relevant, timely, and complete at the time of collection?

Employees enter their own data, and the data provided is voluntary.

3.3.3 How do you check for, and correct as necessary, any inaccurate or outdated PII in the system?

Employees can correct their data after logging in.

3.4 Data Minimization and Retention (DM)

3.4.1 What is the minimum PII relevant and necessary to accomplish the legal purpose of the program?

The minimum amount of PII is currently being collected. Name, e-mail address, birthdate, and other information about lifestyle and health are necessary for the system to be able to help the employee with their health-related goals.

3.4.3 Does the system derive new data or create previously unavailable data about an individual through aggregation or derivation of the information collected? Is the PII relevant and necessary to the specified purposes and how is it maintained?

No.

Yes:

3.4.4 What types of reports about individuals can you produce from the system?

Management reports and health demographics at the aggregate population level for the decreasing or improving health trends are produced.

3.4.6 Does the system monitor or track individuals?

(If you choose Yes, please explain the monitoring capability.)

No.

Yes:

3.5 Individual Participation and Redress (IP)

3.5.1 Do you contact individuals to allow them to consent to your collection and sharing of PII?

When enrolling for the site/program, users are presented with a privacy act statement to inform them that data will be collected. Users are then presented with a privacy policy. They must accept all these, or they are not allowed to use the system. Once enrolled, PII is voluntary and offered by employee. PII collected is not shared. Employees may opt-in to work with a coach that may ask about their life and health status.

3.5.2 What mechanism do you provide for an individual to gain access to and/or to amend the PII pertaining to that individual?

Employees enter and update their own information.

3.5.3 If your system involves cloud computing services and the PII is located outside of USAID, how do you ensure that the PII will be available to individuals who request access to and amendment of their PII?

N/A

3.7 Transparency (TR)

3.7.1 Do you retrieve information by personal identifiers, such as name or number?

(If you choose Yes, please provide the types of personal identifiers that are used.)

- No.
- Yes: OPM GOVT-10

3.7.2 How do you provide notice to individuals regarding?

- 1) The authority to collect PII: Privacy Act Notice
- 2) The principal purposes for which the PII will be used: Users must accept the Privacy Act Notice before entering data.
- 3) The routine uses of the PII: This is defined in the SORN, which is identified in the Privacy Act notice.
- 4) The effects on the individual, if any, of not providing all or any part of the PII: Information is voluntary.

3.7.3 Is there a Privacy Act System of Records Notice (SORN) that covers this system?

- No
- Yes: OPM GOVT-10

3.7.4 If your system involves cloud computing services, how do you ensure that you know the location of the PII and that the SORN System Location(s) section provides appropriate notice of the PII location?

N/A

3.8 Use Limitation (UL)

3.8.1 Who has access to the PII at USAID?

No one other than the employee entering his/her data into the system has access to the PII, unless an employee opts-in to utilize a coach.

3.8.3 With whom do you share the PII outside of USAID? And whether (and how, if applicable) you will be using the system or related web site or application to engage with the public?

Coaches, but only if the employee opts-in.

3.8.4 Do you share PII outside of USAID? If so, how do you ensure the protection of the PII 1) as it moves from USAID to the outside entity and 2) when it is used, maintained, or disseminated by the outside entity?

- No. In accordance with the agreement, data is not shared with others.
- Yes:

3.9 Third-Party Web Sites and Applications

3.9.1 What PII *could be made available* (even though not requested) to USAID or its contractors and service providers when engaging with the public?

N/A

Appendix A. Links and Artifacts

A.1 Privacy Compliance Documents or Links
<input type="checkbox"/> None. There are no documents or links that I need to provide.
<input type="checkbox"/> Privacy Threshold Analysis (PTA)
<input type="checkbox"/> Privacy Impact Assessment (PIA)
<input type="checkbox"/> System of Records Notice (SORN)
<input type="checkbox"/> Open Data Privacy Analysis for Posting Datasets to the Public (ODPA)
<input type="checkbox"/> Data Collection Forms or Surveys
<input type="checkbox"/> Privacy Act Section (e)(3) Statements or Notices
<input type="checkbox"/> USAID Web Site Privacy Policy
<input type="checkbox"/> Privacy Policy of Third-Party Web Site or Application
<input type="checkbox"/> Privacy Protection Language in Contracts and Other Acquisition-Related Documents