



CDC UNIFIED PROCESS PROCESS GUIDE



SYSTEM OF RECORDS NOTICE

Purpose of the Process Guide

CDC projects are required to comply with various CDC and Federal regulations, mandates, policies, processes, and standards. Information about these requirements is available from various websites and supporting documents. However, this information is often not presented from the perspective of the project team and their roles & responsibilities in complying with these requirements. CDC Unified Process (UP) Process Guides provide that perspective.

CDC UP Process Guides help project teams comply with CDC and Federal requirements by:

1. Setting the requirements in the context of their purpose
2. Providing step-by-step instructions for completing the activities required for compliance
3. Illustrating potential integration points between processes
4. Presenting requirements in a concise, easy-to-understand, and consistent format
5. Making that presentation accessible to the CDC community via the CDC Unified Process website

The specific purpose of this Process Guide is to describe the **System of Records Notice** process as it applies to project teams.

Process Overview

This Process Guide covers the requirements for identifying a System of Records (SOR), the elements of a System of Records Notice (SORN), and the publication of a SORN.

Identifying a SOR

The Department of Health and Human Services (HHS) defines a “record” as any item, collection, or grouping of information about an individual that is maintained by an agency. A SOR is a grouping of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual, including, but not limited to:

- Name
- Education
- Criminal History
- Medical History
- Employment History
- Financial Transactions
- Any identifying number, symbol, or other identifier such as a finger print, voice print, or photograph

If any information contained within a SOR is in identifiable form (IIF) the Privacy Act of 1974 requires that the agency in control of that information publish a notice of its SOR in the Federal Register. This notice is referred to as a System of Records Notice. The only time a SORN has to be published is when applying for a new or modified SORN. Otherwise a SORN can be selected from the following link:
<http://www.hhs.gov/foia/privacy/sorns.html>

*Note: When completing the HHS PIA Form a CDC or HHS SORN can be chosen.

Elements of a SORN

A SORN identifies the purpose for the SOR, which individuals are covered by information in the SOR, what categories of records are maintained about the individuals, and how the information is shared by the agency. The SORN also provides notice to the public regarding their rights, and procedures, for accessing and correcting information contained within the system. A SORN typically contains elements information such as:

- *System name*: The name of the SOR



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- *System classification:* Identify whether the system is unclassified or classified. If the system is classified, state the level of classification (secret, top secret, etc.)
- *System location:* The location of the main servers or central file location and regional offices
- *Categories of individuals covered by the system:* List of individuals whose IIF is in the system
- *Categories of records in the system:* Description of all of the records in the system
- *Authority for maintenance of the system:* The agency's authority to maintain the system
- *Purpose(s):* Purpose of the system and explanation why the program collects particular records
- *Routine Uses:* System use must be consistent with the purpose for which the records are collected
- *Disclosure to consumer reporting agencies:* What information is disclosed to reporting agencies
- *Policies and practices for storing, retrieving, securing, retaining, and disposing of records in the system*
- *System Manager(s) and contact information:* Provide positions, titles, and contact information for system managers. This is normally the manager that oversees the program
- *Notification Procedure:* The basic information needed for individuals to make a proper information request of the system's manager, and for the manager to give a proper response to such requests
- *Record Access Procedures:* Describe how an individual gains access to his/her records
- *Contesting Record Procedures:* Describe how an individual contests information pertaining to that individual in the SOR
- *Record Source Categories:* Identify how CDC receives records, for example; individual applicants, other CD SORs, Federal SORs, commercial entities, etc.

Publication of a SORN

The SORN is included in the Privacy Impact Assessment which is included in the Certification and Accreditation (C&A) package. The Business Steward is responsible for the submission of the C&A package to the C&A process team via the C&A mailbox. At CDC when completing the PIA documentation it is the Business Stewards responsibility to decide or consult with the C&A process team to determine if a SORN is required for the system.

- Does/Will collect, maintain (store), disseminate and/or pass through IIF within any database(s), record(s), file(s) or website(s) hosted by this system
- Records on this system are retrieved by one or more data elements. A system can store, transmit and collect IFF but if the data is not being "retrieved" it is not subject to the Privacy Act and does not need a SORN.
- The system is subject to the Privacy Act. Please refer to the following link to determine if your system is subject to the Privacy Act: <http://intranet.cdc.gov/od/ocso/osrs/privacy/guidelin.htm>

Selecting a SORN

SORNs are intentionally written to be broad and encompass many systems under one number. Each system does not have their own individual SORN and the SORN example below illustrates this. CDC has many health statistic systems however; if you are searching for a SORN first look at the SORN name because it can give you a clue, then review the categories of individuals covered by the system. This SORN pertains to NCHS and more than likely this SORN can be used for all of NCHS Health Statistic systems when completing a PIA.

Example. 09-20-0169-Users of Health Statistics. HHS/CDC/CoCHIS/NCHS. (Formerly numbered 09-37-0016.)

System name: Users of Health Statistics. HHS/CDC/NCHS.

Categories of individuals covered by the system: Persons who are past, present, or potential users of health statistics and would therefore have special interests in the programs conducted by the National Center for Health Statistic (NCHS), such as: (1) persons who subscribe to NCHS publication series; (2) persons who purchase NCHS public use data tapes or publications; (3) persons who contact NCHS to request data or information on health statistics; (4) persons who attend health statistics conferences; and



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(5) persons known from their publications or otherwise to have a research, legislative, policy, or administrative interest in data produced by NCHS.

Categories of records in the system: This system consists of information relating to the professional interests of health statistics users, such as their: name, address, position, organization, education, memberships in professional organizations, special committee and task force assignments, offices held in organizations, publications, health statistics meetings attended, uses made of health statistics, health statistics projects, purchases of NCHS tapes or publications, and expressions of interest and concern about health statistics.

Purpose(s): NCHS uses the data in determining how improvements can be made in: (1) the content and methodology of its data programs; (2) its data publications; (3) dissemination of health statistics; and (4) meetings or other means for soliciting users' concerns and knowledge sharing.

Federal Register Information---http://www.cdc.gov/od/science/regs/privacy/fedreg_doc09-20-0168.pdf

Process Attributes

This section provides a list of process attributes to help project teams better understand the requirements necessary to comply with this process and to determine when and how they may impact their project.

PROCESS ATTRIBUTE	DESCRIPTION
Process Owners	Thomas P. Madden
Process Criteria	All IT projects meeting the following conditions: <ul style="list-style-type: none"> • The system collects, maintains (stores), disseminates and/or passes through IIF within any database(s), record(s), file(s) or website(s) hosted by this system • Records in this system are retrieved by one or more data elements • This system is subject to the Privacy Act
Timing of Process in Project Life Cycle	Begins during the planning phase of a project
Estimated Level of Effort	Minimal
Associated Costs	Only the cost of the estimated level of effort described above
Process Prerequisites	Completion of Privacy Impact Assessment (PIA) documents. (See the CDC UP Process Guide for PIA).
Process Dependencies	Capital Planning and Investment Control (CPIC). CDC CPIC requirements are available at http://intranet.cdc.gov/cpic
Related Systems/Tools	HHS PIA Form http://intranet.cdc.gov/ociso/CandA/CandAdocs/SPORT_%2006.1_%20HHS_Privacy_Impact_Assessment_Template.doc
Available Training	N/A
Additional Information	System of Records Notices http://www.hhs.gov/foia/privacy/sorns.html HHS Privacy Impact Assessment http://intranet.cdc.gov/ociso/CandA/CandAdocs/SPORT_%2006.1_%20HHS_Privacy_Impact_Assessment_Template.doc CDC UP PIA Process Guide http://www2.cdc.gov/cdcup/document_library/process_guides/default.asp



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Contact List

This section provides a list of individuals and/or offices that are available to assist project team in answering questions regarding the content of this Process Guide and related topics. The information is correct as of this publication. However, due to the ever-changing nature of our work environment it is possible some information may be out of date.

NATIONAL CENTER	ROLE	NAME
CDC Office of the Chief Operating Officer (OCIO)	Chief Information Officer	James D. Seligman
CDC Office of the Chief Information Officer (OCISO)	Chief Information Security Officer and Senior Official for Privacy	Thomas P. Madden
CDC Office of the Chief Information Officer (OCISO)	Compliance & Education (C&E) Project Manager	Felicia P. Kittles

Key Terms

The CDC Unified Process Team maintains a comprehensive list of key terms and acronyms relevant to all Unified Process artifacts maintained on the CDC UP website. Follow the link below for definitions and acronyms related to this and other documents.

<http://www2.cdc.gov/cdcup/library/other/help.htm>

Activities Checklist

This section provides a list of steps outlining the activities associated with complying with this process. Due to the dynamic nature of the PIA process a website has been established to communicate the most current information regarding PIA requirements. This website also contains a list of the related templates that assist in completing PIA activities.

ACTIVITY	RELATED DOCUMENTS/TOOLS	PERFORMED BY
1. Complete HHS Privacy Impact Assessment Documentation • Answer “yes” to questions 17, 19, or 21 then you need to enter a SORN in question 4 of the PIA	PIA Form http://intranet.cdc.gov/ociso/CandA/CandAdocs/SPORT_%2006.1_%20HHS_Privacy_Impact_Assessment_Template.doc	Business Steward
2. If an applicable SORN can't be found for the system, follow the SORN application process	CDC/ASTDR Privacy Act System Notices – Systems of Records Notices http://www.cdc.gov/od/science/regs/privacy/systemNotices/	Business Steward
3. Submit the PIA with your C&A Package to C&A mailbox	C&A Mailbox CNA@cdc.gov	Business Steward
4. Documentation is reviewed along with the C&A documents		C&A Process Team
5. Documentation Not Approved proceed to next step Documentation Approved proceed to step 8		C&A Process Team
6. Send documentation back to the Business Steward for revisions		C&A Process Team
7. Make revisions to documentation and repeat steps 3 and 4		Business Steward
8. Enter documentation in to system and submit to HHS		C&A Process Team



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Process Flowchart

This section provides a pictorial view of steps outlining the activities associated with complying with this process and who usually performs those activities.

