United States
Consumer Product Safety Commission

Privacy Threat Analysis (PTA)/Privacy Impact Assessment (PIA)	
Name of Application/System:	Child Strength Research Study Recruitment and Data
Office/Directorate of System Owners:	Office of Hazard Identification and Reduction (EXHR), Directorate for Engineering Sciences (ES), Division of Human Factors (ESHF)
Office/Directorate of Business Owners:	EXHR, ES, ESHF
Date:	May 10, 2024
A. Contact Information	
Person Completing PTA/PIA: (Name, title, organization)	Kristen Talcott, Human Factors Engineer, CPSC, EXHR, ES, ESHF
System Owner: (Name, title, organization)	Kristen Talcott, Human Factors Engineer, CPSC, EXHR, ES, ESHF
System Manager/Technical POC: (Name, title, organization)	Matthew Reed, Project Director, University of Michigan Transportation Research Institute (UMTRI)
B. Approving Officials	
System Owner	
Chief Privacy Officer (CPO)	
Chief Information Security Officer (CISO)	
Assistant General Counsel for Freedom of Information Act (FOIA), Records, and Privacy	
Senior Agency Official for Privacy (SAOP)	

C. System of Records Notice	
1. Will the system or application maintain records that contain information about individuals? (Yes or No)	Yes
2. Will the system or application allow records to be retrieved by an individual's name or by some identifying number, symbol, or other identifier assigned to the individual? (Yes or No)	No
3. Will the records maintained by the system or application be considered a new collection of records? (Yes or No)	No
If the answers to Questions 1 and 2 are yes and you do not currently have a System of Records Notice (SORN), one will be required.	
D. Privacy Threshold Analysis (PTA)	
4. Will the information system or application be used to collect, store, or transmit personally identifiable information (PII)? (Yes or No)	Yes
5. Has a Privacy Impact Assessment (PIA) ever been performed for the information system or application? (Yes or No)	No
6. Is there a Privacy Act System of Records Notice (SORN) for this information system or application? (Yes or No)	No
If any of the answers to Questions 4 through 6 are "Yes" then complete the Privacy Impact Assessment (PIA) section (F) of this document. If the answers to Questions 4 through 6 are all "No" then a PIA is not needed. Complete section E below, sign form, and return to the Chief Privacy Officer.	
E. Omission of a Privacy Impact Assessment	
7. Briefly describe the information system or application and provide a supporting statement that explains why a PIA is not needed.	
F. Privacy Impact Assessment (PIA)	

8. Generally describe the type of information that will be collected, stored, or transmitted.	For the child strength research recruitment system, University of Michigan Transportation Research Institute (UMTRI) researchers will collect and store potential participants' name, sex, and age, as well as the parent or guardian's phone number and email address. Research participants will range in age from 3 months through 5 years old.
	For the study, UMTRI researchers will collect and store video and images and force-exertion data of research participants interacting with test fixtures. UMTRI will also obtain several anthropometric measurements and full body laser body scans of the participants.
	Collecting this data supports CPSC Strategic Objective 1.2 (Lead efforts to improve the safety of consumer products before they reach the marketplace through robust and effective safety standards) by meeting Strategy 1.2.2, which requires the agency to conduct research, as needed, to help develop and improve voluntary standards and mandatory regulations.
9. What categories of individuals are covered in the system? (For example, public, employees, contractors)	The categories of covered individuals include research participants and their parents or guardians.
10. Is the personally identifiable information (PII) collected verified for accuracy? Why or why not?	UMTRI researchers will verify the recruitment information when they contact the parent or guardian to make sure that that child participant meets the inclusion criteria for the study and to ensure that they can contact the parent or guardian for scheduling purposes.
	During data collection, researchers will check video, images, anthropometric measurements, and body scans to ensure that the data acquisition system is functioning accurately and that the data has been collected.
11. Is the PII current? How is this determined?	UMTRI researchers will determine if the contact information is current when they contact parents or guardians to schedule a testing session. The videos, images, and body scans will be current at the time they are collected and will not be updated.
12. Who will be responsible for protecting the privacy of the individuals whose PII is collected,	The UMTRI Project Director will be responsible for protecting the privacy of the individuals whose PII is collected, maintained, or shared on the system. PII will be maintained (in de-identified form) according to the policies and procedures of the University of

maintained, or shared in the system? Have policies and/or procedures been established for this responsibility and accountability?	Michigan Institutional Review Board (IRB), which governs human subjects research at the University of Michigan.
13. Is there a process for individuals to have inaccurate PII that is maintained by the system corrected or amended, as appropriate?	Parents or guardians can contact UMTRI researchers to correct or amend recruitment information.
14. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?	The recruitment information will be obtained from either the University of Michigan participant recruitment system or obtained directly from the parents or guardian. For both of these sources, the original source of the information is the parent or guardian and information is supplied voluntarily. Video, images, and body scans will be collected during the research study directly from the child participant.
15. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	Parents and guardian participation in the University of Michigan participant recruitment system is voluntary. The parent or guardian of the child participant will provide written consent prior to study participation or data collection. This form will detail the use of the information. UMTRI researchers will also obtain oral assent from child participants. Participation in the study is voluntary.
16. Do other systems that interconnect to the system share, transmit, or access the PII in the system? If yes, explain the purpose for system to system transmission, access, or sharing of PII.	No other systems interconnect to the system share, transmit, or access the PII in the system. All PII study data (videos, images, body scan images) will be stored on a password-protected University server accessible only to the UMTRI researchers and study team members.
17. What involvement will contractors have with the design and maintenance of the system? Has a	UMTRI researchers will design and maintain the system and will be the only people who have access to the PII. The contractor has not signed a confidentiality agreement or an NDA.

contractor confidentiality agreement or a Non-Disclosure Agreement (NDA) been developed for contractors who work on the system?	
18. What are the retention periods of PII for this system? Under what guidelines are the retention periods determined? Who establishes the retention guidelines?	Gathering data is the primary objective of the study. Data will be retained at UMTRI in de-identified form indefinitely for analysis. Data retention is in accordance with the policies and procedures of the University of Michigan Institutional Review Board (IRB), which governs human subjects research at the University of Michigan.
19. What are the procedures for disposition of PII at the end of the retention period? How long will any reports that contain PII be maintained? How is the information disposed? (For example, shredding, degaussing, overwriting)	Data will be retained at UMTRI in de-identified form indefinitely for analysis.
20. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?	No.
21. Who will have access to the data in the system? (For example, contractors, managers, system administrators, developers, other)	The UMTRI research team will have access to the data in this system; researchers will provide deidentified data to CPSC staff.
22. What controls are in place to prevent unauthorized access to the data?	All PII data (videos, images, body scan data) are recorded on secured, disk-level encrypted University computers with password-controlled access and then backed-up to the University of Michigan's (UMTRI) server. Access is restricted UMTRI

	researchers and study team members. All data will be protected using a de-identified subject ID code. The key connecting the ID code to the subject's PII will be destroyed following the validation of the subject's data, typically within one week.
23. What controls are in place to prevent the misuse of PII by those having access?	UMTRI researchers and study team members are required to authenticate to establish a secured connection to UMTRI computers and server.
24. Is access to the PII being monitored, tracked, or recorded?	The data management and security plan is reviewed by a University of Michigan Institutional Review Board (IRB), which governs human subjects research at the University of Michigan. Policies and procedures are in accordance of the University of Michigan Information and Technology Services Safe Computing practices. The system manager/technical POC is responsible for assigning access to the study team members.
25. For CPSC support staff, how is access to the PII determined? Are criteria, procedures, controls, and responsibilities regarding access documented? Does access to PII require manager approval?	CSPC support staff will not have access to this system.
26. What third-party organizations will have access to the PII? Who establishes criteria for what PII can be shared?	The UMTRI researchers will be the only organization with access to the PII. The University of Michigan IRB establishes the criteria for what PII can be shared and who it can be shared with.
27. What CPSC personnel roles will have access to PII fields? (For example, users, managers, system administrators, developers, contractors, other)	No CPSC staff will have access to the PII. UMTRI researchers will only share deidentified data with CPSC staff.

28. Will any of the PII be accessed remotely or physically removed?	UMTRI researchers and study team members will be able to access the UMTRI servers remotely, by initiating a U-M virtual private network (VPN) and authenticating to establish a secured connection to UMTRI computers and server.