United States
**Consumer Product Safety Commission**

| Privacy Threat Analysis (PTA)/Privacy Impact Assessment (PIA) | |
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| **Name of Application/System:** | Arizona State University Adult Bathing/Shower Surface Slip Resistance Study |
| **Office/Directorate of System Owners:** | Office of Risk Reduction (EXRR), Directorate of Engineering Sciences (ES) |
| **Office/Directorate of Business Owners:** | EXRR, ES |
| **Date:** | April 3, 2025 |
| **A. Contact Information** | |
| **Person Completing PTA/PIA:** (Name, title, organization) | Caitlyn Borghi, Chief Privacy Officer, Office of Information and Technology Services<br>Brad Gordon, EXRR, ES |
| **System Owner:** (Name, title, organization) | Brad Gordon, Mechanical Engineer, EXRR, ES |
| **System Manager/Technical POC:** (Name, title, organization) | Thurmon Lockhart, Professor of Biomedical Engineering, Arizona State University |
| **B. Approving Officials** | |
| BRADLEY GORDON<br>System Owner | Digitally signed by BRADLEY GORDON<br>Date: 2025.04.04 10:21:00 -04'00' |
| CAITLYN BORGHI<br>Chief Privacy Officer (CPO) | Digitally signed by CAITLYN BORGHI<br>Date: 2025.04.03 14:55:48 -04'00' |
| KHALID NUMAN AL-HASSAN<br>Chief Information Security Officer (CISO) | Digitally signed by KHALID NUMAN AL-HASSAN<br>Date: 2025.04.04 10:25:45 -04'00' |
| ABIOYE MOSHEIM OYEWOLE<br>Assistant General Counsel for Freedom of Information Act (FOIA), Records, and Privacy | Digitally signed by ABIOYE MOSHEIM OYEWOLE<br>Date: 2025.04.04 11:59:37 -04'00' |
| <br>Senior Agency Official for Privacy (SAOP) | Digitally signed by BRYAN BURNETT<br>DN: c=US, o=U.S. Government, ou=Consumer Product Safety Commission, cn=BRYAN BURNETT, 0.9.2342.19200300.100.1.1=61001000009719<br>Date: 2025.04.04 13:51:39 -04'00' |

| C. System of Records Notice | |
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| **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) | Yes |
| 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)** | |

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| **8. Generally describe the type of information that will be collected, stored, or transmitted.** | Pursuant to the Consumer Product Safety Act (Public Law 92-573; 86 Stat. 1207, Oct. 27, 1972), CPSC has contracted with Arizona State University (ASU) to conduct human slip research in support of ASTM International's efforts to improve standards for bathing surface safety. ASU will collect research participants' names and signatures on a consent form and assign them an identification number. ASU will create a document with participants names, phone numbers, addresses, and assigned identification number. All other information collected during the study will be associated only with this identification number. Research participants will fill out a medical questionnaire to determine whether they are eligible to participate in the study. The medical questionnaire will collect participants' sex, age, height, weight, emergency contacts, and medical information related to the study. The study assessments will capture information on how participants interact with bathing floor surfaces under different conditions. Information will be collected via a full motion capture system and cameras focused on participants' feet.<br><br>The data collected as part of this study may also be used in dissertations, theses, masters applied projects, journal articles, and conference presentations. Deidentified information and study results may also be shared with third party organizations. |
| **9. What categories of individuals are covered in the system?** (For example, public, employees, contractors) | The research participants will be members of the public between the ages of 65 and 95. ASU will recruit 36 participants for the year-long study. |
| **10. Is the personally identifiable information (PII) collected verified for accuracy? Why or why not?** | ASU is not verifying the information collected from research participants for accuracy. |
| **11. Is the PII current? How is this determined?** | Information will be collected from individuals the same day they participate in the study, so all information provided to ASU is presumed to be current. |
| **12. Who will be responsible for protecting the privacy of the individuals whose PII is collected, maintained, or shared in the system? Have** | The principal investigator (PI) of the study is responsible for protecting the information involved in this study. ASU has provided CPSC guidelines on how the information will be stored, how long information will be stored, who will have access to the information, and how information will be protected. The principal investigator has or will have completed human subjects research training prior to beginning this study. |

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| **policies and/or procedures been established for this responsibility and accountability?** | |
| **13. Is there a process for individuals to have inaccurate PII that is maintained by the system corrected or amended, as appropriate?** | ASU will not provide participants with their personal results from the study. |
| **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?** | ASU will collect information directly from the research participants. |
| **15. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?** | Research participants opt-in to the study. They are provided with a consent form detailing the study's purpose, procedures, and risks, among other relevant information. Research participants are free to withdraw from the study at any time and for any reason. There will be no consequences to research participants for withdrawing from the study. |
| **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. All PII will be on paper files stored in a locked file cabinet. |
| **17. What involvement will contractors have with the design and maintenance of the system? Has a contractor confidentiality agreement or a Non-** | ASU is responsible for the system on which information is maintained and stored. |

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| **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?** | If a potential participant is not qualified for the study, their medical history form will be shredded by the end of the day on which it is collected. ASU will store the study data for up to ten years after it is collected. |
| **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) | If a potential participant is not qualified for the study, their medical history form will be shredded by the end of the day on which it is collected. Other electronic data will be stored and deleted. |
| **20. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?** | No, this system is not currently identified as a system of records. |
| **21. Who will have access to the data in the system?** (For example, contractors, managers, system administrators, developers, other) | ASU undergraduate researchers, collaborative researchers, graduate research assistants, and post-doctoral fellows will have access to the data. |
| **22. What controls are in place to prevent unauthorized access to the data?** | The data is deidentified and study participants are assigned an identification number. All study files except the consent form will use the identification number. |
| **23. What controls are in place to prevent the** | The principal investigator has or will have completed human subjects research training prior to beginning this study. |

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| **misuse of PII by those having access?** | |
| **24. Is access to the PII being monitored, tracked, or recorded?** | PII will be written on paper files and stored in a locked file cabinet. Access to keys for the cabinet will be granted and monitored by the PI. |
| **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?** | Access to the PII will only be granted, by the PI, to individuals listed on the institutional review board (IRB) application. These individuals will be required to attend training on how to handle PII. |
| **26. What third-party organizations will have access to the PII? Who establishes criteria for what PII can be shared?** | Third-party organizations will not have access to the PII. Deidentified information may shared with third-party organizations. |
| **27. What CPSC personnel roles will have access to PII fields?** (For example, users, managers, system administrators, developers, contractors, other) | ASU staff will have access to the PII. |
| **28. Will any of the PII be accessed remotely or physically removed?** | No. |