

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

10/06/2016

OPDIV:

AHRQ

Name:

EvidenceNOW Exchange System (ENX)

PIA Unique Identifier:

P-8160552-635691

The subject of this PIA is which of the following?

Minor Application (stand-alone)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

Is this a FISMA-Reportable system?

Yes

Does the system include a Website or online application available to and for the use of the general public?

Yes

Identify the operator.

Contractor

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

Yes

Describe the purpose of the system.

The EvidenceNOW Exchange system supports seven regional cooperatives composed of multidisciplinary teams of experts that will each provide quality improvement services to up to 300 small primary care practices. These services include onsite coaching, consultation from experts in health care delivery improvement, sharing best practices, and electronic health record support. The seven cooperatives have developed unique interventions designed to improve health care delivery. These interventions include a combination of five core services to help primary care practices improve quality of care—services that are typically not available to smaller practices because of their size. The system will support the dissemination of data regarding on-site practice facilitation and coaching, data feedback and benchmarking, electronic health record support, expert consultation, and shared learning collaborative.

The system is also a digital hub that allow AHRQ grantees, AHRQ affiliated partners, and AHRQ staff to communicate with each other on an on-going basis to share resources, research results, program challenges and successes, and best practices. The system is also a platform for dissemination of important information such as a library of patient-centered outcomes research (PCOR) resources including clinical guidelines and intervention tools for primary care practices on the ABCs (Aspirin use, Blood Pressure control, Cholesterol management, Smoking cessation). It will engage and coordinate technical assistance activities, including a calendar of events and AHRQ team grantee site visits. The system is accessible to users via a desktop, tablet or mobile phone.

Describe the type of information the system will collect, maintain (store), or share.

The EvidenceNOW Exchange system is a closed system of 500 approved member users that are AHRQ awarded grantees, AHRQ employees, and AHRQ contractors. The types of information the system collects, maintains, and share documents, message posts that can include updates, questions, links, poll content, etc.; member profile information that includes name, email address, phone number, profile description, and a member photo. Information also includes event information, title of event, location of event, date/Time of event, description of event, event agenda, attendees, and associated event files. The system also collects questions from members regarding specific learning network categories, as well as questions regarding the Exchange Program.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

The system collects and maintains member profile information to provide point of contact information for each of the regional cooperatives. The profile information is also used to allow communication between cooperatives and small and medium sized patient care services with patients in rural and diverse populations. Members may post events that are hosted locally or within a region for members to gain more information and find registration details.

The system serves a closed group of members to share information; ideas and documents to support knowledge transfer amongst one-another. The core system feature allows users to post messages, ask questions, share documents and comment on each other's posts. Additionally, users can join specific groups and post messages by groups of topics as defined by a community manager of the system.

Information collected from AHRQ employees and direct contractors is used to provision account access to develop and maintain the system.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Name

Photographic Identifiers

E-Mail Address

Mailing Address

Phone Numbers

System administrator and developer username and password

URL

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Employees

Vendor/Suppliers/Contractors

Funded Grantees

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

The PII is used for the following purposes; users can contact other users on the system via messaging and email; users can contact each other outside the system via email; users can visually identify others at meetings or other in-person events; and the system can send users both informational emails such as events and management information such as reset password links. In addition, AHRQ employee and direct contractor information is used to provision account access for development and maintenance tasks.

Describe the secondary uses for which the PII will be used.

N/A

Identify legal authorities governing information use and disclosure specific to the system and program.

Section 913 and 306 of the Public Health Service (PHS) Act (42 U.S.C. § 299b-2 and 242k(b)).

Sections 924(c) and 308(d) of the PHS Act (42 U.S.C. 299c-3(c) and 242m(d)).

Are records on the system retrieved by one or more PII data elements?

Yes

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.

SORN is In Progress

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Email

Online

Government Sources

Within OpDiv

Non-Governmental Sources

Private Sector

Other

Identify the OMB information collection approval number and expiration date

N/A

Is the PII shared with other organizations?

Yes

Identify with whom the PII is shared or disclosed and for what purpose.

Within HHS

To inform AHRQ program offices as a means of supporting member questions or questions.

Describe any agreements in place that authorizes the information sharing or disclosure.

N/A

Describe the procedures for accounting for disclosures.

PII is collected and shared with consenting members within the system to provide a method of communication. Member access to other members' information for this purpose is not tracked.

All PII information is disclosed to all users. User access to PII is not tracked once approved for system access.

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

All system users are presented with a privacy policy notice on the initial login screen required to enter the site as follows: The system does not collect personally identifiable information (PII) about individuals unless the individual chooses to provide that information to us. Any personal information you choose to provide is protected by security practices. Non-personal information related to your visit to our website may be automatically collected and temporarily stored. HHS does not disclose, give, sell, or transfer any personal information about our visitors unless required for law enforcement or by Federal law. AHRQ employees and direct contractors must provide their AHRQ username and password for system account provisioning on the system. There is no notice provided to them at the time of this collection.

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

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.

The current configuration of the system does not include opt-in or opt-out of PII; however users do have the ability to edit/modify PII on their own profile. There is not a unique notice and consent process incorporated in this system, however users may remove all their PII from the system by sending an email to the system administrator or community manager (tac@evidencenowexchange.org) requesting to be removed from the system. These procedures are outlined with the privacy policy statement and the FAQ's/Help section of the system. AHRQ employees and direct contractors cannot opt-out of providing their information for system account provisioning.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

If a major change to the system related to PII occurs, the privacy policy notice shown on the login screen and homepage notice will be updated to reflect it. Additionally, the system will send an email notification to members explaining the privacy policy has changed. AHRQ employees and direct contractors may contact the system administrator or system owner directly with concerns as a result of a major system change.

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.

Users can contact the grant AHRQ program office or email the helpdesk for the system at tac@evidencenowexchange.org). These procedures are outlined with the privacy policy statement and the frequently asked questions (FAQ)/Help section within the system. Individuals can also report suspected fraud, breaches, or other issues to the business process owner, who in turn would notify the AHRQ Privacy Office. AHRQ employees and direct contractors can contact the system administrator or the system owner directly to resolve any concerns.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

An AHRQ employee or direct contractor serving as a community manager and system administrator reviews member profile data on a monthly basis to determine if the information is complete. The purpose of the system is to allow profile information be shared, and if a member cannot be contacted do to inaccurate data, the community manager or system administrator will connect with the member whose information was discovered as inaccurate and work to resolve the data inaccuracy. Additionally, all users of the application system may also update and correct any PII within their profile to ensure the relevancy of their contact information.

Identify who will have access to the PII in the system and the reason why they require access.

Users:

One of the primary purposes of this application is to facilitate collaboration between members of a learning network. As such, sharing of personal information will occur within a small and closed community on a voluntary basis. All users of the application will have access to basic profile information that has been voluntarily shared.

Administrators:

To ensure that members whose profile is in the system can collaborate with other members and member information is displayed correctly within the system.

Developers:

To facilitate and maintain the ability for members to see other member profiles and to maintain the availability of member profiles within the system.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

AHRQ employees and direct contractors who serve as developers and administrators have access to PII that is available and provided as profile information from the general member community. Role-based access is defined and approved by the system administrator and the system owner. Once approved, members, AHRQ employees and direct contractors are assigned access to the system with assigned privileges based upon the defined roles, which limit their access to PII to limit the amount needed to accomplish their objectives.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

The system includes an information-sharing model that enables granular control of the access to information based on roles, permissions and rights. The system administrator leverages this model to limit the access to information to appropriate system profiles and roles such that users only access information necessary to perform their function (System Administrator, Community Manager, and Community Member). The access for the information system is actively managed, users' access permissions are reviewed/adjusted, and unneeded or expired accounts are removed from the system.

Identify training and awareness provided to personnel (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 AHRQ employees and contractors that support the system must complete and comply with annual AHRQ IT Security and Privacy Awareness Training.

Describe training system users receive (above and beyond general security and privacy awareness training).

All AHRQ and director contractors who act as system administrators and community managers are provided with training on the configuration of information sharing within the application. This training enables them to understand how to use a combination of sharing settings, profiles and roles in order to support the configuration of the application such that it maintains compliance with the stated privacy policy and complies with best practice and general security and privacy requirements.

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

Yes

Describe the process and guidelines in place with regard to the retention and destruction of PII.

PII shall be maintained indefinitely until the appropriate National Archives and Records Administration (NARA) General Records Schedule for retention or disposal of the PII in the system can be identified.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Administrative controls include user group and role membership requirements that are established by the system owner during a new user request process. All users are provided unique user ID and password. A supervisor approves all user accounts before the request is sent to a system administrator to create the account. The system owner reviews and approves all user account requests before completing and submitting the new user account request form. Technical controls include user authentication controls, such as accounts that are locked for fifteen minutes after three consecutive invalid login attempts. Physical controls include: Authorized personnel must pass through five levels of biometric scanning to reach the Salesforce system cages; All buildings are completely anonymous, with bullet-resistant exterior walls and embassy-grade concrete posts and planters around the perimeter; All exterior entrances feature silent alarm systems that notify law enforcement in the event of suspicion or intrusion; Data is backed up to disk, and backups do not physically leave the data center.

Identify the publicly-available URL:

www.evidencenowexchange.org

Note: web address is a hyperlink.

Does the website have a posted privacy notice?

Yes

Is the privacy policy available in a machine-readable format?

Yes

Does the website use web measurement and customization technology?

Yes

Select the type of website measurement and customization technologies is in use and if it is used to collect PII.

Session Cookies that do not collect PII.

Persistent Cookies that do not collect PII.

Does the website have any information or pages directed at children under the age of thirteen?

No

Does the website contain links to non- federal government websites external to HHS?

No

Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?

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