

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

12/27/2016

**OPDIV:**

AHRQ

**Name:**

AHRQ.gov Website

**PIA Unique Identifier:**

P-9835227-921977

**The subject of this PIA is which of the following?**

Minor Application (child)

**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?**

Existing

**Does the system have Security Authorization (SA)?**

Yes

**Indicate the following reason(s) for updating this PIA.**

Alteration in Character of Data

**Describe in further detail any changes to the system that have occurred since the last PIA.**

The AHRQ.gov Website PIA was updated to include information about MONAHRQ, a desktop software tool that enables organizations—such as state and local data organizations, regional reporting collaborations, hospitals and hospital systems, nursing homes and nursing home organizations, and health plans—to quickly and easily generates a health care reporting Web site. MONAHRQ has two collections applicable to this PIA: the MONAHRQ registration collection (referred to as Collection 1 in this PIA) and MONAHRQ Technical Assistance email account collection (referred to as Collection 2).

**Describe the purpose of the system.**

AHRQ.gov is a system that supports and operates the main public facing website of Agency for Healthcare Research and Quality's (AHRQ). It helps disseminate AHRQ program and organizational information, including information on all AHRQ programs supported and maintained by AHRQ.

The website provides information on healthcare topics, including an alphabetical listing of topics that members of the public can search, information for patients and consumers, such as health aware bulletins about safety tips for hospitals, diagnosis and treatment, information for healthcare professionals, including links that provide training and clinical guidelines and recommendations, case studies and stat information for policymakers, research tools and statics on type of care, treatment, and quality, funding and grants information for researchers who wish to work with AHRQ, and organizational information such as general points of contact for AHRQ offices, centers, and programs. The system also supports MONAHRQ, a desktop software tool that enables organizations—such as state and local data organizations, regional reporting collaborations, hospitals and hospital systems, nursing homes and nursing home organizations, and health plans—to quickly and easily generates a health care reporting Web site. MONAHRQ has two collections applicable to this PIA: the MONAHRQ registration collection (referred to as Collection 1 in this PIA) and MONAHRQ Technical Assistance email account collection (referred to as Collection 2). The MONAHRQ listserv email mailing list is managed under the AHRQ.gov PIA.

Collection 1: The MONAHRQ registration system is a voluntary collection form is prompted when a website visitor clicks on the download MONAHRQ web-link. Completing the form is completely voluntary and the form has a prominent “No thanks” button that if clicked still allows download of the software. The information collected includes email address, and responses to three questions related to use of the MONAHRQ software. Once a month, the email address and responses are separated from each other in the system, and the email addresses are added to the MONAHRQ email mailing list. Any responses (without any identifiable information) are anonymously compiled into a dated Excel file kept on the Main Point of Contact’s password-protected work computer. Collection 2: The MONAHRQ Technical Assistance email account (MONAHRQ TA mailbox) is a Federal email account that is used to respond to user-initiated inquiries about the MONAHRQ software tool. The MONAHRQ email mailing list is a list of email addresses that are uses for updating interested parties about the MONAHRQ project. Someone may sign up for the listserv either through the main AHRQ subscriptions at AHRQ.gov newsletter sign-up system, or through Collection 1.

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

AHRQ.gov provides general information about AHRQ’s programs that support AHRQ’s mission and allows visitors to navigate to specific program websites for further information. AHRQ.gov is an interface between AHRQ program and offices and any member of the public that wishes to visit the website. For example, AHRQ uses AHRQ.gov to direct individuals to program or office websites that inform members of the public on strategies to improve health care access, foster appropriate use, and reduce unnecessary expenditures by providing information on ways to reduce health care disparities especially for women, children, the elderly, people with disabilities, and residents of inner cities and rural areas; providing a web portal for Healthcare Cost and Utilization Project (HCUP) to conduct an ongoing nationwide survey of about 15,000 households each year that helps researchers and policymakers learn more about how Americans use and pay for their health care; working in partnership with 25 States and the health care industry to build a multi-State health data system to inform research and decision-making at Federal, State, and community levels; and, providing financial support and technical assistance to researchers examining how the organizational and financial features of the U.S. health insurance and health care delivery systems can improve health care access and quality for the Nation's low-income children.

Any information, including PII, provided to AHRQ by a member of the public is voluntary. PII includes email address, name, mailing address, telephone number, subject, and question. Members of the public that wish to ask a question or provide feedback may provide this limited amount of personal information so that AHRQ may respond. PII collected from users/system administrators in order to access the system, consists of user credentials (i.e. username, password, Personal Identity Verification (PIV) card and/or email address).

Users/system administrators include AHRQ employees and direct contractors (using HHS user credentials only). Regarding the MONAHRQ Collection 1, prior to 11/30/2016, collected email address, first name, last name, telephone number, and (to assist in customer service) three responses (the category of organization they represent, the expected use of the software, and the audience they intend to reach with the software and the audience they intend to reach with the software). This first name, last name, and telephone number information was aggregated once a month. As of 11/30/2016, all of the files containing the first name, last name, and telephone number information have been deleted, and the email address, first name, last name, telephone number are no longer collected. Only the email addresses are added to the MONAHRQ email mailing list once a month and then deleted (see Special Note in response to question #11). Regarding Collection 2, the MONAHRQ TA mailbox receives inquiries from users and responds to them. The email messages are maintained for one year and contain other PII (beyond the inquirer's email address), this is considered and email inquiries are kept secured only in the mailbox, and then deleted after 1 year.

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

Any information, including PII, provided to AHRQ by a member of the public is voluntary. Members of the public that wish to ask a question or provide feedback may provide a limited amount of personal information via a web form including email address, name, mailing address, telephone number, subject, and question. This information is then provided to the correct AHRQ program or office point of contact for response back to the question or comment directly as appropriate. The information is shared with the program or office so that a response can be sent to the individual, and the system does not store this information. Individuals that wish to leave feedback provide an email address along with the comment, and the email is used to reply to any concern, but is not stored by the system. Finally, system administrators and developers provide an email address and a first and last name to provision AHRQ employee and administrator user accounts.

Regarding MONAHRQ Collection 1, this collection was created to assist in customer service so that if changes were made to MONAHRQ users could be notified. The three responses (the category of organization they represent, the expected use of the software, and the audience they intend to reach with the software) were included to assist in customer service and to better understand uses and users so that the program could better fill user needs. Prior to 11/30/2016, the MONAHRQ listserv registration collected email address, first name, last name, telephone number, and (to assist in customer service) three responses (the category of organization they represent, the expected use of the software, and the audience they intend to reach with the software). This first name, last name, and telephone number information was aggregated once a month.

As of 11/30/2016, all of the files containing the first name, last name, and telephone number information has been deleted, and the collection 1 no longer collects this information. Only the email addresses are added to the MONAHRQ email mailing list once a month and then deleted (see Special Note under Section 11). AHRQ employee user credentials are used to provision account access. Collection 2 (technical assistance mailbox) provides a means for MONAHRQ users to reach out to the Government and get assistance in using the software. The system stores email inquiries for 12-months, and then deletes the inquiries (and therefore any contained information). The emails received are open format and therefore can contain other PII (beyond the inquirer's email address), this is considered and email inquiries are kept secured only in the mailbox, and then deleted after one year. AHRQ employee and direct contractor user credentials are used to provision account access.

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

Yes

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

Name

E-Mail Address

Mailing Address

Phone Numbers

System administrator and developer username and password

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

Employees

Public Citizens

Business Partner/Contacts (Federal/state/local agencies)

Vendor/Suppliers/Contractors

**How many individuals' PII is in the system?**

500-4,999

**For what primary purpose is the PII used?**

The system collects PII to respond to requests submitted through AHRQ.gov via a web form to respond to public feedback submitted by a user of the website or to answer questions submitted by a user of the website). PII is also used to provision user accounts for AHRQ employees and direct contractors who serve in administrator or developer roles. For MONAHRQ Collection 1, the PII collected (i.e. email addresses) are separated from the responses and added to the MONAHRQ listserv. For Collection 2, the PII (i.e. email addresses) received as part of the users' inquiries are contained within the Government email box, and used to respond to the inquiring user.

**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?**

No

**Identify the sources of PII in the system.**

Email

Online

**Government Sources**

Within OpDiv

**Non-Governmental Sources**

Public

**Identify the OMB information collection approval number and expiration date**

N/A

**Is the PII shared with other organizations?**

No

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

Members of the public who wish to ask a question or provide feedback to AHRQ may submit an electronic form through the AHRQ.gov website and provide PII so that AHRQ may respond to their inquiry. All PII provided to AHRQ is not collected unless the individual chooses to provide the information. The AHRQ privacy policy states that information that is provided through these means is used to respond to a message or to fulfill the stated purpose of the communication, and that the information provided is handled on a confidential basis within the agency.

AHRQ employees and direct contractors provide information for the purpose of gaining access to the system to maintain and develop AHRQ.gov. Employees and contractors are informed that they must provide PII in order to be provisioned an account.

**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.**

Members of the public may choose to provide PII to contact AHRQ, however, individuals are also provided a phone number that they may call AHRQ to ask a question or provide feedback as well. The submission of PII to contact AHRQ is voluntary and members of the public who have submitted their PII to AHRQ may contact AHRQ by phone to opt-out of the use of their PII. Visitors to the AHRQ website wishing to download the MONAHRQ software can simply opt-out by selecting the "no, thanks" button that is clearly located, and their download of MONAHRQ software begins, the same as if they registered. PII is required for the use of MONAHRQ. AHRQ employees and direct contractors are required to provide their information for account provisioning, and there is no opt-out method.

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

PII is used only for the single purpose of responding to a question or feedback that has been provided through AHRQ.gov. Once a reply has been sent the individuals' PII is not used for another purpose. There are no determinations made about individuals based upon their PII, so no notification is provided to have their consent obtained when changes occur to the system. Additionally, all communications to the website are archived on a monthly basis and destroyed on an annual basis. In the event of any changes to the use or operation of users will be notified via email and phone to alert users of the change. AHRQ employees and director contractors are aware of and support any changes to the MONARHQ.

**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.**

Individuals may contact AHRQ by mail, phone, or email to address any concerns regarding the inappropriate use, disclosure, or if PII is inaccurate within the system after submission of the information. If a registrant feels that they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate within the MOANHRQ collections, the system owner will work with the registrant user to directly explain address any corrections that need to occur. AHRQ employees and direct contractors must ensure their user credentials are updated and accurate for use of MONARHQ.

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

PII is used only for the single purpose of responding to a question or feedback that has been provided through AHRQ.gov. Generally the information provided to AHRQ is accurate at the time of submission for this purpose. Once a response has been provided, an individual's PII is no longer used for any other purpose. As a result, no reviews are conducted to ensure the data's integrity, accuracy, and relevancy. On a bi-weekly basis the MONAHRQ system owner reviews any new information collected by the system, and if the data's integrity, availability, accuracy and relevancy are in question, then the system owner will seek to resolve the issue directly with the registrant user. AHRQ employee and direct contractor credentials must be current and accurate to provide support for MONAHRQ.

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

**Administrators:**

Administrators have access to PII to respond to messages sent to AHRQ.

**Developers:**

Developers have access to the system to provide system maintenance, ensure system operations, and maintain the system website.

**Contractors:**

Direct contractors that support system development and maintenance.

**Others:**

AHRQ program managers may be provided the email address and question or feedback from an individual in order to appropriately address the question or feedback.

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

Developers and administrators are not firewalled from the limited PII within the system, however the role of the developer does not require use or view of PII to perform application maintenance or upgrades around the use and availability of the web forms. Roles are defined and established by the system owner and developers and administrators, including direct contractors that perform these roles, are assigned access and privileges to access the system. Program managers are only provided PII when a single instance, such as a specific question or feedback, pertaining to their program requires their attention to craft a response.

**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.**

Once roles for accessing the application are assigned and approved by the system owner, access is assigned based upon the role. Each role within the system is segregated by the ability to access the system, and way in which they may access PII within the system. Roles are managed by the system owner and any authorized individual who needs additional access to the system, and to the PII that resides on the system, must be approved before additional level of access is granted. The only PII and other information collected is the minimum required to provide basic technical assistance from users and to provide software patches and updates as specified on the registration page. No additional information is collected or maintained. AHRQ employee and direct contractors are granted access to MONAHRQ to support the installation and operation, The system owner reviews and provisions all account access.

**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 direct contractors that support the system must complete the AHRQ annual Information Technology Security and Privacy Annual Training.

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

N/A

**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.**

No records schedule currently exists for this system. Records will be maintained until a records schedule has been identified.

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

The administrative controls used in this system include controls for all personnel and direct contractors with access to AHRQ information systems must complete HHS-mandated security awareness training within 30 days of being hired or granted access. The technical controls used on this system include Active Directory, Group Policy Objects (Windows) and salt stack (Linux) are used to set permissions that the organization employs the automated management mechanisms to support the management of information system accounts. Physical controls include, but are not limited to the use of locked cabinets to store server hardware, which are housed in an access-controlled, secure data center. All controls are documented fully in the Security Assessment Report (SAR).

**Identify the publicly-available URL:**

<http://www.ahrq.gov/>

<http://www.ahrq.gov/professionals/systems/monahrq/index.html>

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?**

Yes

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

No