# Privacy Impact Assessment (PIA): HRSA - IRMS - QTR3 - 2020 - HRSA615906

Signed Date: 10/1/2021

### Acronyms

ATO - Authorization to Operate

**CAC - Common Access Card** 

FISMA - Federal Information Security Management Act

**ISA - Information Sharing Agreement** 

**HHS - Department of Health and Human Services** 

**MOU - Memorandum of Understanding** 

NARA - National Archives and Record Administration

**OMB - Office of Management and Budget** 

**PIA - Privacy Impact Assessment** 

PII - Personally Identifiable Information

**POC - Point of Contact** 

PTA - Privacy Threshold Assessment

**SORN - System of Records Notice** 

SSN - Social Security Number

**URL - Uniform Resource Locator** 

#### **General Information**

PIA ID: 1337277

Title:

HRSA - IRMS - QTR3 -PIA Name:

2020 - HRSA615906

HRSA - Integrated Resources Management System

**HRSA** OpDiv:

# Legacy PIA ID:

### **PTA**

PTA - 1A:	Identify the Enterprise	

Performance Lifecycle Phase of

Operations and Maintenance

the system

Is this a FISMA-Reportable PTA - 1B:

system?

Yes

Does the system include a website Yes PTA - 2:

or online application?

Are any of the URLs listed PTA - 2A:

accessible by the general public (to include publicly accessible log in and internet websites/online

applications)?

# **URL Details**

PTA - 5A:

List Of URL Type of URL

https://irms.hrsa.gov/ HHS Intranet (HHS Internal)

Is the system or electronic PTA - 3:

Agency

collection, agency or contractor operated?

Is the data contained in the system Agency PTA - 3A:

owned by the agency or

contractor?

Does the system have or is it PTA - 5:

Yes

covered by a Security

Authorization to Operate (ATO)?

If yes, Date of Authorization 4/22/2019

If no, Planned Date of ATO PTA - 5B:

Please give a brief overview and The Integrated Resource Management System (IRMS) is a Standardized PTA - 8:

	purpose of the system by describing what the functions of the system are and how the system carries out those functions?	commitment register used to support HRSA's funds control process. The system allows for the capture of budget, commitment, obligation, and disbursement data which provide HRSA capability to monitor Agency budgets and the status of commitment and obligation documents. IRMS reporting feature includes standard and ad hoc fund and document status reports that are exportable in pdf, Excel, and HTML, and improve HRSA's capability to provide other management reports. IRMS is one of the major corrective actions to Anti-Deficiency violation that occurred at HRSA in FY 2005.
PTA - 9:	information that are collected (into), maintained, and/or shared in the system regardless of whether	1. HRSA will receive through automated transfer of Unified Financial Management System (UFMS) Extract Files, budget and accounting transactions which includes allowances (funding); commitments (reservations of funds); obligations (uses of funds); disbursements (liquidation of obligations); and the related accounting codes (e.g., Common Accounting Number/Budget and Accounting Classification Structure).
		2. The integrated budget, accounting, and administrative data are collected to facilitate the tracking and monitoring of each commitment, obligation, and disbursement against allowances (available funds). IRMS collects, maintains, or disseminates data only for authorized users.
		3. IRMS provides reporting capabilities to support financial analysis and reporting. The centralized data, facilitates the timely sharing of budget information Agency-wide providing improved information for resource management decisions. IRMS supplements the Unified Financial Management System.
		4. IRMS does not collects, maintain, or disseminate PII.
PTA -9A:	Are user credentials used to access the system?	Yes
PTA - 9B:	Please identify the type of user	HHS User Credentials
	credentials used to access the system.	HHS Email Address
		HHS Password
		HHS Username
PTA - 10:	Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual	This investment provides automated procedures for the recording, monitoring, and tracking of commitment, obligation, and disbursement transactions against allowances, and to determine the availability of funds. The investment provides reporting capabilities to support financial analysis and reporting. The centralized data, facilitates the timely sharing of budget information Agency-wide providing improved information for resource management decisions. IRMS supplements the Unified Financial Management System.
PTA - 10A:	Are records in the system retrieved by one or more PII data elements?	No
PTA - 10B:	Please specify which PII data elements are used.	
PTA - 11:	Does the system collect, maintain, use, or share PII?	No
		PIA
PIA - 1:	Indicate the type of PII that the system will collect or maintain	Truncated SSN
		Driver's License Number
		Taxpayer ID
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared	Other
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system	Above 2000

PIA - 4:	For what primary purpose is the PII	Program integrity
PIA - 4:	need?	
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g., testing, training, or research)	Financial management (i.e., improper payments)
PIA - 6:	Describe the function of the SSN/Taxpayer ID.	Truncated SSNs are collected in CMS exclusionary files to support program integrity for the following: is not currently terminated from participation in Medicare or precluded from receiving payment through Medicare Advantage or Part D; is not currently excluded from participation in Medicare, Medicaid, and other Federal health care programs; and does not currently have Medicare billing privileges revoked.
PIA - 6A:	Cite the legal authority to use the	Per the Terms and Conditions of the Provider Relief Fund https://www.hhs.gov/sites/default/files/terms-and-conditions-phase-3-general-distribution-relief support program integrity functions with the PRF.
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	Data Use Agreement between HRSA and CMS
PIA - 8:		N/A. IRMS does not retrieve any PII by personal identifier
PIA - 9:	Identify the sources of PII in the system	Other HHS OPDIV
PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	Not applicable – we do not collect information from the public
PIA - 9B:	Identify the OMB information collection expiration date.	
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	No
PIA - 11:	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason	Not applicable, see PIA 9A
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 13:	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	
PIA - 14:	Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of original collection). Alternatively, describe why they cannot be notified or have their consent obtained	Not applicable, see PIA 9A

PIA - 15:	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. If no process exists, explain why not	Not applicable, see PIA 9A	
PIA - 16:	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy, and relevancy. Please address each element in your response. If no processes are in place, explain why not	IRMS complies with HRSA and HHS Security Security requirements, including those for PII and data retention.	
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users Administrators Contractors	
	Provide the reason of access for ea	ach of the groups identified in PIA -17	
PIA - 17A:	Specific users from HRSA Office of management will have access to P	f Budget and Finance and Office of Provider Support that have been authorized by III data.	
PIA - 17B:	Select the type of contractor	HHS/OpDiv Direct Contractor	
PIA - 18:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	Completion of IRMS Access request form along with and supervisor approval. IRMS will elevate any requests to third level if justification s	s questic
PIA - 19:	Describe the technical methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job	Only users who have been authorized by management can have access to PII date.	
PIA - 20:	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	Not Applicable. Since IRMS users do not input PII data into IRMS. IRMS receives and show PII data from United Health Group (UHG) daily download.	
PIA - 21:	Describe training system users	Not Applicable. Since IRMS users do not input PII data into IRMS. IRMS receives truncated PII data from United Health Group (UHG) daily download.	
PIA - 23:	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific NARA records retention schedule(s) and include the retention period(s)	IRMS follow the guidelines of HRSA and NARA records retention schedule(s) for the retention and destruction of PII data. The retention and destruction disposition of IRMS is currently pending NARA approval. Please refer to the IRMS Records schedule attached under Supporting Documents section	

PIA - 24: Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response

IRMS secure PII data by encrypting data at rest, implementing oracle features, and Secure File Transfer Protocol. IRMS is using Oracle Transparent Data Encryption (TDE) which provides security for the data in files that are saved on disk (or at rest) by encrypting that data. It stops unauthorized attempts from the operating system to access database data stored in files, without impacting how applications access the data using SQL. Encrypted data remains encrypted in the database, whether it is in tablespace storage files, temporary tablespaces, undo tablespaces, or other files that Oracle Database relies on.

PIA - 25:

Describe the purpose of the web site, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response

IRMS website link https://irms.hrsa.gov/. IRMS can only be accessed by HRSA employees that have been approved the access the system. IRMS Accounts are role-based. There are three unique system roles, each with their own permission set. These roles include data reader, data manager/data entry, and administrator. Each role has limited access in accordance with their responsibilities. No user can access the applications functions that are not assigned to their role. Those roles determine which of the IRMS capabilities are available to each user. Organizational security determines which specific data tables and rows are accessible to a user. The level of access that a given user has is, therefore, a function of their IRMS role(s) and of the organization in which they are a part.

FIA - 20.	privacy notice?	163
PIA - 27:	Does the website use web measurement and customization technology?	No
PIA - 27A:	Select the type of website measurement and customization technologies is in use and if it is used to collect PII	
PIA - 28:	Does the website have any information or pages directed at children under the age of thirteen?	No
PIA - 28B:	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PIA - 29:	Does the website contain links to	No

non-federal government websites

external to HHS?

Does the website have a posted

Yes

PIA - 26: