

Signed Date: 5/6/2020

**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**

<b>PIA Name:</b>	HRSA - IntegrityM - QTR1 - 2020 - HRSA585063	<b>PIA ID:</b>	1078746
<b>OpDiv:</b>	HRSA	<b>Title:</b>	HRSA - IntegrityM
<b>Legacy PIA ID:</b>			

**PTA**

<b>PTA - 1A:</b>	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance
<b>PTA - 1B:</b>	Is this a FISMA-Reportable system?	Yes
<b>PTA - 2:</b>	Does the system include a website or online application?	No
<b>PTA - 2A:</b>	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	
<b>URL Details</b>		
<b>Type of URL</b>	<b>List Of URL</b>	
No Records Found		
<b>PTA - 3:</b>	Is the system or electronic collection, agency or contractor operated?	Contractor
<b>PTA - 3A:</b>	Is the data contained in the system owned by the agency or contractor?	
<b>PTA - 5:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
<b>PTA - 5A:</b>	If yes, Date of Authorization	10/10/2019
<b>PTA - 5B:</b>	If no, Planned Date of ATO	
<b>PTA - 8:</b>	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions?	The Children's Hospitals Graduate Medical Education (CHGME) Program and the Teaching Health Center Graduate Medical Education

(THCGME) Program provide federal funds to support graduate medical education (GME) programs that train medical and dental residents. The children's hospitals and teaching health centers participating in the CHGME and THCGME Programs have a large number of GME programs and residents being trained. In accordance with Section 1886 of the Social Security Act, the Contractor shall assess the FTE resident counts and additional supporting documentation provided by the providers for all relevant cost report periods. The purpose of the system is to access and store information obtained as a result of the assessments to ensure that appropriate regulations, program policies and guidelines are followed in determining which residents are eligible to be claimed for GME funding provided by the GME Programs. The FTE resident assessment results completed under this contract will be available to Center for Medicare and Medicaid Services (CMS) auditors, to accurately assess the number of Full Time Employee (FTE) resident counts that will be: 1) included in the Medicare Cost Report for those children's hospitals that receive funding from CMS, and 2) excluded in the Medicare Cost Report for those hospitals affiliated with THC training that also receive funding from CMS.

<b>PTA - 9:</b>	List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.	The system will contain information obtained from the children's hospitals and teaching health centers participating in the CHGME and THCGME programs. This will include FTE resident counts and additional supporting documentation provided by the providers for all relevant cost report periods. The system will also contain Personally Identifiable Information (PII) including: SSN, Name, DOB, email address, phone number, graduate certificate, education records, legal documents and employment status. No user credentials collected.
<b>PTA - 9A:</b>	Are user credentials used to access the system?	No
<b>PTA - 9B:</b>	Please identify the type of user credentials used to access the system.	
<b>PTA - 10:</b>	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	Information collected directly from Providers to be used for audit and HRSA results reporting includes:

1. Detailed listing of all interns and resident reported on the HRSA 99-1 as well as the cost report.
2. Resident rotation schedules with code definitions
3. Written agreements with non-hospital sites
4. Listing of part-time residents
5. List of residents in non-approved programs, residents replacing Certified Registered Nurse Anesthetists (CRNAs) and moonlighting residents
6. Documentation related to residents in non-provider settings and list of names
7. Educational Commission for Foreign Medical Graduates (ECFMG) certificates for all international medical graduates
8. Copies of all affiliation agreements, as well as addendums, the hospital participates in
9. If applicable, Dental & podiatry residents' curriculum vitae, resumes, and resident files.

Information collected directly from Medicare Administrative Contractor (MACs) to be used for audit and HRSA results reporting includes:

1. Copy of CMS Star screens showing status of the Medicare Cost Report
2. Intern and Resident Information System (IRIS) Electronic Files
3. Medicare Worksheet E-4
4. Medicare GME base year Cap Affiliation Agreements, if applicable, and any communication regarding these agreements (i.e. emails/letters)

<b>PTA - 10A:</b>	Are records in the system retrieved by one or more PII data elements?	Yes
<b>PTA - 10B:</b>	Please specify which PII data elements are used.	
<b>PTA - 11:</b>	Does the system collect, maintain, use or share PII?	Yes

### PIA

<b>PIA - 1:</b>	Indicate the type of PII that the system will collect or maintain	Social Security Number Name E-Mail Address Phone numbers Certificates Education Records Date of Birth Legal Documents Employment Status
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared	Employees/ HHS Direct Contractors Public Citizens
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system	Above 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	To assess compliance with HRSA FTE Graduate Resident Assistance Education requirements.

<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research)	Not Applicable.
<b>PIA - 6:</b>	Describe the function of the SSN/Taxpayer ID.	The SSNs are not utilized to conduct contract operations. On occasion, SSNs may be included within documentation provided to IntegrityM, however this information is not formally requested for this contract.
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN	Executive Order 9397
<b>PIA - 7:</b>	Identify legal authorities, governing information use and disclosure specific to the system and program	5 USC 301, Departmental regulations
<b>PIA - 8:</b>	Provide the number, title, and URL of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or indicate whether a new or revised SORN is in development.	Not Applicable.
<b>PIA - 9:</b>	Identify the sources of PII in the system	Government Sources Within the OPDIV Non-Government Sources Members of the Public Private Sector Other
<b>PIA - 9A:</b>	Identify the OMB information collection approval number or explain why it is not applicable.	Not Applicable.
<b>PIA - 9B:</b>	Identify the OMB information collection expiration date.	
<b>PIA - 10:</b>	Is the PII shared with other organizations outside the system's Operating Division?	Yes
<b>PIA - 10A:</b>	Identify with whom the PII is shared or disclosed and for what purpose	Private Sector
<b>PIA - 10A (Justification):</b>	Explain why (and the purpose) PII is shared with each entity or individual.	Contractor and Subcontractor for the purpose of performance of the GME assessments.
<b>PIA - 10B:</b>	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement, Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	Interconnection Security Agreement and Data Use Agreement with subcontractor
<b>PIA - 10C:</b>	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII	IntegrityM Records Management Policy in place. All documents under HRSA contract subject to this policy.
<b>PIA - 11:</b>	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason	No prior notice is given as IntegrityM does not request information directly from an individual. All requests are made to the healthcare provider or institution that maintains applicable records.
<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
<b>PIA - 13:</b>	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	There is no option to object or opt-out of collection of information. Individuals are required to adhere to specifications identified in grant application requests. In addition, IntegrityM does not request information directly from an individual. All requests are made to the healthcare provider or institution that maintains applicable records.

<b>PIA - 14:</b>	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	Individuals cannot be notified because IntegrityM does not request information directly from an individual. All requests are made to the healthcare provider or institution that maintains applicable records.
<b>PIA - 15:</b>	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	Individuals do not have the option to resolve concerns regarding PII disclosure as IntegrityM does not request information directly from an individual. All requests are made to the healthcare provider or institution that maintains applicable records.
<b>PIA - 16:</b>	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	Contractor Data Use Agreement completed by users to confirm compliance with security protocols to maintain integrity of PII data obtained and used for assessments.
<b>PIA - 17:</b>	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 each of the groups identified in PIA -17 Users - Contractor and subcontractor auditors and project manager.  Administrators - Contractor administrator  Contractors - Direct contractors work to conduct audits of records in conjunction with contractual Statement of Work requirements for HRSA.	
<b>PIA - 17A:</b>		
<b>PIA - 17B:</b>	Select the type of contractor	HHS/OpDiv Direct Contractor
<b>PIA - 18:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	Per Contractor Data Access Policy and procedure, users are provided access only in accordance with job responsibilities and authorization to access data per contract with HRSA. Under this policy and procedure, the IntegrityM program director identifies direct contractor staff required to utilize PII to complete audits per scope of contract and submits system access to IT department based on contract requirements.
<b>PIA - 19:</b>	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	Per Contractor Data Access Policy and procedure, users are provided access only in accordance with job responsibilities and authorization to access data per contract with HRSA. User access follows Minimum Necessary Standard and users are granted access by folder, subfolder and system needs based on requirements set forth in the HRSA contract and Program director's determination of files necessary to perform job function.
<b>PIA - 20:</b>	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	Authorized users who receive access to the system complete HRSA specific training in the areas of Security and Privacy.
<b>PIA - 21:</b>	Describe training system users receive (above and beyond general security and privacy awareness training).	Users do not receive additional training beyond general security and privacy awareness training
<b>PIA - 23:</b>	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific NARA records	The Contractor shall maintain files in accordance with HHS Policy for Records Management. The

	retention schedule(s) and include the retention period(s)	<p>contractor shall also manage and maintain Federal records, including electronic records, in accordance with all applicable records management laws/codes and regulations, including but not limited to the Federal Records Act (44 U.S.C. Chapters. 21, 29, 31, 33); 36 CFR § 1236.20 (“What are appropriate recordkeeping systems for electronic records?”) &amp; 1236.22 (“What are the additional requirements for managing electronic mail records?”); NARA Bulletin 2013-02, August 29, 2013, Guidance on a New Approach to Managing Email Records.</p> <p>Managing the records includes maintaining records to retain functionality and integrity throughout the records’ full lifecycle, including: (1) maintenance of links between records and metadata, and (2) categorization of records to manage retention and disposal, either through transfer of permanent records to NARA or deletion of temporary records in accordance with NARA-approved retention schedules.</p> <p>Records are maintained at a minimum for 3 years. If business need requires longer than 3 years, retention period is extended until no longer required for business need.</p>
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	<p>All PII is secured on IntegrityM servers. Servers are located in a physically secure server room at the IntegrityM main office. Access to the offices are controlled by electronic key cards and access to the server room is restricted to only authorized personnel by lock and key.</p> <p>All contract data is also physically segregated on the server and encrypted with FIPS 140-2 compliant encryption. Only authorized personnel are granted access rights using unique username and password. Any remote authorized work is conducted through a secure encrypted connection using 2 factor authentication.</p>
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	Questions 25-29 to be updated in future review.
PIA - 26:	Does the website have a posted privacy notice?	No
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 non-federal government websites external to HHS?	No