US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:
04/04/2016

OPDIV:
CMS

Name:
Warehouse Librarian

PIA Unique Identifier:
P-3497175-446922

The subject of this PIA is which of the following?
Major Application

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?
No

Identify the operator.
Agency

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.
PIA Validation

Describe in further detail any changes to the system that have occurred since the last PIA.
None

Describe the purpose of the system.
The CMS warehouse maintains an inventory of publications, forms, manuals, and commodity items. Providers, intermediaries, advocacy groups, CMS employees, and other government agencies order these items on a daily basis, at no cost to them. Warehouse Librarian (WL) is a Commercial Off-The-Shelf (COTS) system that provides hardware and software support for the storage and retrieval of these items. The WL system receives requests for stock from two sources via the Warehouse Ordering Management Business Analysis Tool (WOMBAT), and via "Hot Picks". "Hot Picks" are high priority orders that are entered into WL by warehouse staff. These requests are received internally and are input into WL.
Warehouse Librarian is used to manage stock totals and locations in CMS warehouse, and to manage fulfillment of warehouse orders.

Most order are generated by the WOMBAT system, and are transmitted to the WL system for fulfillment throughout the day.

Nightly, the Warehouse Librarian sends a list of updated stock totals to the WOMBAT system, to update its running totals of stock available for order.

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

Warehouse Librarian maintains names and mail location/addresses of internal and external CMS customers for their account information and details, such as product type request and quantities, about their orders from WOMBAT. The collection of this information enables orders to be shipped and maintains tracking of orders. The system maintains the information until the order is wiped from the system during regular order info purging. WL collects username and passwords for CMS system users.

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

The Warehouse Librarian system is a COTS product that manages CMS warehouse inventory (forms, publications, misc items) and warehouse orders for those items.

The Warehouse Librarian is used to manage stock totals and locations in CMS warehouse, and to manage fulfillment of warehouse orders. Most order are generated by the WOMBAT system, and are sent down to the WL system for fulfillment throughout the day.

Nightly, the Warehouse Librarian sends a list of updated stock totals to the WOMBAT system, to update its running totals of stock available for order. WL collects names and mail location/addresses of internal and external CMS customers (for their account information) and details about their orders in order to track and process their orders. These customers consists of public citizens, hospitals, and CMS employees. Names are only retained for a defined period after orders are shipped and then purged from the system on a defined schedule (along with any order information).

WL collects username and passwords of CMS system users in order to access the system to process orders 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

Mailing Address

Phone Numbers

Other - Username, 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?

100-499

For what primary purpose is the PII used?

The primary purpose of the PII is to ship orders to customers who request warehouse items. User names and passwords of CMS employees and contractors are used to control access to the system.

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.

42 CFR 401.101–401.148 and 1106(a) of the
Social Security Act, 42 U.S.C. 1306(a); 5 U.S.C. 301, Departmental Regulations.

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.

09-70-3005, Correspondence Tracking Management System

SORN is In Progress

Identify the sources of PII in the system.

Email

Other

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?
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.
If there is a change in how customer's PII are used, policies will be updated on the CMS system, WOMBAT, where the customer provides account information (this is a separate system from WL and outside of its scope). WL receives extract files from WOMBAT. When customers place an order, they agree to have their names, business shipping addresses, telephone numbers and account information stored. They are also notified that names and shipping addresses will be needed for orders (if they don't agree, they can elect not to place the order). The customer's telephone number is optional to enter but, if entered it is considered PII.

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.
They are notified by another CMS system, WOMBAT, that their names and shipping addresses are needed for orders. The customer's telephone number is optional. If they don't agree, they can elect not to place an order. CMS employee user credentials are essential to performing their job duties and cannot be opted out of providing this information.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.
WL is a COTS product and the data use and disclosure will not change. If the system were to change, customers would be notified via mail before they start the ordering process.

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.
There is no direct collection of PII within the WL system. All PII is collected outside of the WL system and passed to it via another CMS system, WOMBAT. The PII is not stored in WL and is only retained until the order is complete. The requestor is able to verify that their PII is correct before submitting to WOMBAT.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.
The PII cannot be improperly or inadvertently destroyed because only system users are responsible for entering the requestor's account information. The data that is within WOMBAT is downloaded into an abstract to be input into WL. There is no way for WL to ensure that WOMBAT has passed the correct data as this is the responsibility of the WOMBAT system. The requestor is able to verify that their PII is correct via WOMBAT before submitting through WOMBAT. Once information is input into WOMBAT by the requestor the information cannot be changed. They are given the opportunity to make changes before submitting. The orders cannot be changed by any other person. The orders are sent to Warehouse Librarian by a flat file which cannot be altered. Once an order is complete, the information is only retained for a defined period after orders are shipped and then purged from the system on a defined schedule.

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

Users:

Process orders

Administrators:

Perform system maintenance and verify shipping orders

Developers:

To test system changes and ensure code changes do not alter customer shipping data

Contractors:

To ship orders to correct contact

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

The WL system has role based access as required by the CMS Acceptable Risk Safeguards(ARS). Only CMS authorized users, administrators, developers, and contractors are allowed to access PII. Roles are defined for each type of user and assigned by the WL System Administrator.

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 WL system enforces role based privileges to users and this limits their access to the minimum amount of information necessary to perform their job. System and network access is limited to CMS employees and contractors with properly issued credentials.

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.

Every CMS employee and contractor must take the CMS Computer Based Training as well as the privacy awareness training every year to ensure the awareness of everyone's responsibility to the system and CMS.

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

The business owner is responsible for training individuals on the system. When a new employee is hired, they are trained on how to use the carousel to retrieve items, how to go into the system to retrieve request and mark for completion. There is no additional security awareness or privacy training needed beyond what is required for all CMS employees to access WL.

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.

The WL processes in place with regards to the retention and destruction of data are in accordance with the National Archives and Records Association (NARA) General Records Schedule (GRS) 20 in which WL will destroy/delete when 7 years 6 months, 10 years 6 months, or 20 years 6 months old, based on the maximum level of operation of the Certification Authority, or when no longer needed for business, whichever is later; and GRS 24 in which WL will delete/destroy when agency determines they are no longer needed for administrative, legal, audit or other operational purposes.

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

All CMS Systems are subject to Rules of Behavior agreements and security protocols. The information can only be accessed by authorized personnel. Computer are only accessed by an employees with PIV cards and a password created by the user. CMS also has firewalls and security measures in place to protect unauthorized users from accessing CMS systems. The system itself is on a private isolated network which is only accessible from a guarded location in the CMS warehouse, which is locked up during non-business hours. The identification of everyone that enters the facility as well as the warehouse is checked.