US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:
11/14/2016

OPDIV:
AHRQ

Name:
Health Literacy Universal Precautions Toolkit

PIA Unique Identifier:
P-2487344-014861

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?
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 Agency for Healthcare Research and Quality commissioned the University of North Carolina at Chapel Hill to develop and test this Health Literacy Universal Precautions Toolkit. The toolkit offers primary care practices a way to assess literature to raise awareness of healthcare research and information. This system hosts two learning modules, the Health Literacy Knowledge Self-Assessment (KSA), and the Health Literacy Performance Improvement Module (PIM). The KSA module can be used by organizations that issue maintenance of certification or continuing education credit. To receive credit, health care professionals must answer 80% of the 50 multiple choice items on the topic of health literacy. Many of the items use clinical scenarios to introduce the material; topics are applicable to health care professionals across different specialties. The KSA provides rationales for the correct and incorrect answers and refers learners to articles and websites for more information.

The PIM module guides clinicians in implementing a tool from AHRQ's Health Literacy Universal Precautions Toolkit and measuring its impact. Clinicians conduct two quality improvement cycles, collecting brief patient surveys and self-assessment data three times: 1) before implementing the selected tool, 2) after implementation of the tool, and 3) after they make additional changes to their implementation of the tool.

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

Users of the KSA and PIM modules must enter a first and last name, organizational email, organizational name and organizational title to register an account to use the modules. Once a user account is created users must enter a username and password to continue the use of the modules. AHRQ employees and direct contractors who serve as system administrators and developers provide their name and AHRQ email, and create a password, to be provisioned an account to access the system.

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

The system modules are for educational purposes to help adult and pediatric practices ensure that systems are in place to promote better understanding by all patients. The toolkit is divided into manageable chunks so that its implementation can fit into the busy day of a practice. PII that is collected is to register for access to the modules and the information is not shared with any other agency or program for any purpose. AHRQ employees and direct contractors who serve as system administrators and developers provide their name and AHRQ email, and create a password, to be provisioned an account to access 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

E-Mail Address

Employment Status

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)

How many individuals' PII is in the system?

5,000-9,999

For what primary purpose is the PII used?

All collected PII is used to provide program or research updates to interested individuals, provide a point of contact for currently published research, and to provide research packets and to solicit comments from individuals on Effective Health care (EHC) research topics supported within KSA and PIM. PII is also used to provision accounts for system administrators and developers.

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)) provide authority for protecting restrictions on identifiable information about individuals.

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.

Users and system administrators are notified at the time of registration that PII is collected to create a user account to access the KSA and PIM modules. Users must then submit PII in order to create and account and access these modules.

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.

Users and system administrators who wish to terminate their user accounts after they are created may contact the Health Literacy program system owner to have their user account terminated and their PII removed from the system.

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

PII is only used for access to the KSA and PIM educational modules. Should the way in which access is gained, or another use of this PII is planned or intended, users will be notified by email of the planned new uses of information so that users may opt-out of any new uses of information. Direct contractors, who act as system administrators and developers, are required to provide their AHRQ email, password, and username for system account provision and access.

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 that believe PII submitted for registration purposes was inappropriately collected or used by AHRQ may contact AHRQ, or the Health Literacy Program, directly to address and resolve the concerns. System owners have the ability to identify and address any concerns regarding the use of PII. Direct contractors that act as system administrators and developers may contact the system owner to resolve a concern regarding their PII.

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

Users must provide a username and password before accessing the KSA and PIM modules. Users are also responsible for updating any information about themselves in order to continue to maintain access to the modules. There are no procedures in place to ensure the integrity, availability, accuracy, and relevancy of the minimal amount of collected PII.

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

Users:

Users can log into their account and access their own PII to update their information.

Administrators:

Direct contractors that act as administrators have access to PII in order to release program news and updates to members of the public who have elected to receive information.

Developers:

Direct contractors that act as developers have access to the system to provide system maintenance, ensure system operations, and maintain the system website.

Contractors:

Director contracts require access to perform administrators and developer roles.

Others:

Members of the AHRQ-managed Health Literacy program management that can address individuals concerns regarding the collection and use of PII.

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

AHRQ employees and direct contractors who act as administrators and developers have full read/write access to PII as part of their normal duties to maintain the system and the PIM and KSA modules. However, developers and administrators do not interact with any PII in the system as part of their daily roles. Any role requiring access to PII must be approved by the system owner before accessing is granted.

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 Health Literacy system are assigned and approved by the Health Literacy system business owner, a system administrator assigns access based upon the role and each role within the system is segregated by the ability to access the system, and PII within the system. Roles are approved by the system owner and managed by the system administrator and any authorized individual who needs additional access to the system, and to the PII that resides on the system, must be approved by the Health Literacy business owner before additional level of access is granted.

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 AHRQ Health Literacy 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 the assignment of least privilege. Only administrators that need the necessary access to see information to complete a task have permissions to do so. The technical controls used in this system include systems being configured according to configuration baselines. Systems will be configured according to Defense Information Systems Agency (DISA) Security Technical Implementation Guide (STIG) with possible modifications to ensure that systems have all the necessary functionalities. 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://hlmoc.ahrq.gov

http://hlknowledge.ahrq.gov

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?
Yes