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:	1190147
PIA Name:	HRSA - CARES - PRF - QTR3 - 2020 - HRSA611573 **Title:** HRSA - CARES Provider Relief Fund Payment Portal
OpDIV:	HRSA

PTA

PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Initiation
PTA - 1B:	Is this a FISMA-Reportable system?	No
PTA - 2:	Does the system include a website or online application?	Yes

URL Details

Type of URL	List Of URL
Publicly accessible website with log in	https://covid19.linkhealth.com/

PTA - 3:	Is the system or electronic collection, agency or contractor operated?	Contractor
PTA - 3A:	Is the data contained in the system owned by the agency or contractor?	Agency
PTA - 5:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
PTA - 5A:	If yes, Date of Authorization	4/8/2020

PTA - 6:	Indicate the following reason(s) for this PTA. Choose from the following options.	New
PTA - 8:	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?	To determine eligibility for payments from the Public Health and Social Services Fund, maintain an accounting of payments, process payments from the Fund, and collect attestation from providers regarding payments.
PTA - 9:	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.	Banking information, records of funds disbursed, identifying information of p roviders, record of attestation.
PTA -9A:	Are user credentials used to access the system?	Yes
PTA - 9B:	Please identify the type of user credentials used to access the	Non-HHS User Credentials Email address Password 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	The system intakes data files from HHS that identify providers, performs analytics on the data file to determine if a provider has electronic payment information already on file, and uses the resulting data to process payments to providers via ACH. Providers also must visit a website to complete an attestation related to their payment which requires the provider to input certain demographic information and Taxpayer ID information. Providers may also have to register on a separate portal if they do not already have payment information on file with the contractor.
PTA - 10A:	Are records in the system retrieved by one or more PII data elements?	Yes
PTA - 10B:	Please specify which PII data elements are used.	Taxpayer Identification Number (TIN) (TIN is the main identifier, however, basic provider information, including address is also retained).
PTA - 11:	Does the system collect, maintain, use, or share PII?	Yes
PIA		
PIA - 1:	Indicate the type of PII that the system will collect or maintain	Name E-Mail Address Phone numbers

		Taxpayer ID
		Financial Account Info
		Others - IP Address
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained, or shared	Grantees
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 used?	To process payments and verify provider identity for purposes of determining amount of fund disbursement and attestation tracking.
PIA - 6:	Describe the function of the SSN/Taxpayer ID.	Taxpayer Identification Number (TIN) is the main identifier for verifying provider identity for purposes of determining amount of fund disbursement and attestation tracking
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	31 U.S.C. 3512, 3711, 3716, 3721, 1321 note; E.O. 13520.
PIA - 8:	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.	09-90-0024, Financial Management System Records https://www.federalregister.gov/documents/2015/11/03/2015-27980/privacy-act-of-1974-system-of-records-notice
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains
		Online
		Government Sources
		Within the OPDIV
		Non-Government Sources
		Private Sector
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	Yes
PIA - 10A:	Identify with whom the PII is shared or disclosed and for what purpose	Private Sector

PIA - 10A (Justification):	Explain why (and the purpose) PII is shared with each entity or individual.	To facilitate payments under the CARES Act.
PIA - 10B:	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)).	Letter Contract between the Health Resources and Services Administration and United Healthcare Services, Inc.
PIA - 10C:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII	To be determined.
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	A Privacy Act Statement is presented to a provider before entering any information on the attestation website: The following statement serves to inform you of the purpose for collecting personal information required by the covid19.linkhealth.com website and how it will be used. AUTHORITY: 31 U.S.C. 3512, 3711, 3716, 3721, 1321 note; E.O. 13520. PURPOSE: To collect information to determine eligibility for CARES Act funds and process payments to you. ROUTINE USES: The information collected is used by HHS to determine eligibility for payments from the Public Health and Social Services Fund, maintain an accounting of payments, and process payments from the Fund. Examples of other permissible uses include, but are not limited to, a contractor (and/or to its subcontractor) who has been engaged to perform services on an automated data processing (ADP) system used in processing financial transactions, to appropriate law enforcement agencies when relevant to an investigation, to the Treasury Department, and to auditing organizations conducting financial or compliance audits. A complete list of routine uses may be found at https://www.federalregister.gov/documents/2015/11/03/2015-27980/privacy-act-of-1974-system-of-records-notice DISCLOSURE: Voluntary. If you choose not to provide your information, absence of the requested information may result in administrative delays or the inability to process payments to you under the CARES Act. ***** The website also has a website privacy policy that also describes information that may be collected in using the site. There is a website privacy policy that describes the information that will be collected for providers that need to register for electronic payment with the contractor.
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	There is not an opt-out available. To complete the attestation process, the provider must enter TIN information to affirmatively identify the provider making the attestation. Contact email and phone number must be provided to allow HHS to contact providers. Provider may withdraw consent for use after the initial collection. To receive ACH payments, if a provider is not currently in the contractor's system, they will have to register to become eligible to receive that ACH payment.
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	If changes in the permitted disclosures or uses change after collection, then the corresponding Privacy Act Statement, Privacy Act System of Records Notice, and/or website Privacy Policy would be updated. Those updates would put individuals on notice of the additional uses and disclosures, but no additional consent would be captured.
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	The HHS System of Records Notice contains a contact for questions about the Privacy Act system and that contact would route concerns to the appropriate HHS officials. The contractor's website Privacy Policies contain customer service numbers that individuals may call to make a complaint and the contractor has internal processes to route that to their Privacy Office for triage, remediation, and response.
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	To ensure integrity of data, the contractor conducts periodic vulnerability and penetration test scans and data is encrypted at rest and in transit. To ensure availability of data, the contractor has disaster recovery processes, backups of data, and does load testing. Accuracy of data is checked throughout the process. There are data validations done on incoming data from HHS and reconciliations of TINs and amounts paid are done during and after funds are disbursed. Relevant information is maintained by only allowing providers to input the minimum necessary information into the attestation portal.
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Contractors
	Provide the reason of access for each of the groups identified in PIA -17	
PIA - 17A:	To administer data analytics to files received by HHS and to administer the attestation and other websites associated with the disbursement of CARES Act payments.	
PIA - 17B:	Select the type of contractor	Third-Party Contractor (Contractors other than HHS Direct Contractors)
PIA - 18:	Describe the administrative procedures in place to	Contractor privileges are formally authorized and controlled, allocated to users on a need-to-use and event-by-event basis for their functional role (e.g., user or administrator), and documented for each system product/element. Provisioning is managed through enterprise managed solution (i.e.

	determine which system users (administrators, developers, contractors, etc.) may access PII	Secure) and requires a multi-level approval process, which is captured within the provisioning system. Access within applications is managed through roles which are commensurate with PII and PHI.
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	All contractor employees are subject to and trained on company policies that require them to access only the minimum information necessary to perform their job functions. Role-based access to PII also establishes what PII is available to a particular employee.
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	All contractor employees and subcontractors must complete a computer-based training course on privacy and security requirements within 30 days of hire and an annual refresher course thereafter.
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	In customer or provider-facing business processes, additional training is provided prior to direct engagements with customers or providers.
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)	A records schedule is being identified. Records will be maintained indefinitely in the interim.

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	PII will be secured in the system using various administrative, technical, and physical safeguards.
		Administrative controls include maintaining information protection and risk management programs, including a formal risk assessment process, to identify critical assets and mitigate threats and vulnerabilities. UnitedHealth Group employees must also complete training, which provides comprehensive security and privacy education and is updated annually to reflect changes in risk. Access privileges to applications are formally authorized and controlled, allocated to users on a need-to-use and event-by-event basis for their functional role (e.g., user or administrator), and documented for each system product/element.
		Technical controls include maintaining the confidentiality and integrity of covered information at rest using an encryption method appropriate to the medium where it is stored. End-to-end encryption is in place from data source to destination database using industry standard mechanisms. Firewalls are in place and configured to limit unauthorized and malicious traffic to the application and associated components, including volumetric attacks against the network, authentication services, and application. Automated systems are used to aggregate logs on activities of security systems and system records continuously and identify, document, and alert on anomalies. Vulnerability scans are performed regularly to assess, rank, and remediate vulnerabilities identified in systems.
		Physical controls include controlling and enforcing physical access to areas containing or processing covered information. Only approved individuals with authorized access may gain entry to a facility where the information systems reside. UnitedHealth Group actively monitors restricted areas in real time using security video surveillance and intrusion detection systems.
PIA - 26:	Does the website have a posted privacy notice?	Yes
PIA - 27:	Does the website use web measurement and customization technology?	Yes
PIA - 27A:	Select the type of website measurement and customization technologies is in use and if it is used to collect PII	Web bug/ beacons - Collects PII Session Cookies - Collect PII Persistent Cookies - Collect PII
PIA - 28:	Does the website have any information or pages directed at children under the age of thirteen?	No
PIA - 29:	Does the website contain links to non-federal government websites external to HHS?	Yes
PIA - 29A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	Yes
PIA - 29B:	Is a TPWA needed for this system?	No