US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:
08/31/2016

OPDIV:
AHRQ

Name:

Guidelines, Measures, Innovations System

PIA Unique Identifier:
P-5712521-250374

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

Indicate the following reason(s) for updating this PIA.

Describe the purpose of the system.
The National Guideline Clearinghouse (NGC) and National Quality Measures Clearinghouse (NQMC) are sponsored by the Agency for Healthcare Research and Quality's (AHRQ's) Center for Evidence and Practice Improvement (CEPI) while the PSNet is sponsored by AHRQ's Center for Quality Improvement and Patient Safety (CQuIPS). The mission of CEPI is to generate new knowledge, synthesize evidence, translate science on what works in health and health care delivery, and catalyze practice improvement across health care settings; the mission of CQuIPS is to improve the quality and safety of our health care system through research and implementation of evidence. In support of the missions, the CEPI and CQuIPS has developed and maintains publicly accessible web sites through the Guidelines, Measures, and Patient Safety Enclave (GMPS). The GMPS is a cluster of databases and web servers providing public access to an extensive amount of health-related research information and include the following:

NGC: The National Guideline Clearinghouse (NGC) is a comprehensive database of evidence-based clinical practice guidelines and related documents.

The NGC provides physicians, nurses, and other health professionals, health care providers, health plans, and integrated delivery systems an accessible mechanism for obtaining objective, detailed information on clinical practice guidelines and to further their dissemination, implementation, and use.

NQMC: The NQMC is a database and website for information on specific evidence-based health care quality measures and measure sets. NQMC is used to promote widespread access to quality measures by the health care community and other interested individuals.

HMIS: The HHS Measures Inventory System is a tool that allows HHS and its agencies to present to the public the quality measures in use across HHS/agency programs for quality improvement, accountability and public reporting. The HMIS has a private site (access-controlled) and a public facing site. The NQMC hosts the HMIS.

Orbital: Orbital is a web-based, internal facing authoring tool used to publish quality measures and guidelines to NQMC, HMIS, and NGC, respectively.

PSNet: The PSNet is an online resource featuring the latest news and essential resources on patient safety. The site offers weekly updates of patient safety literature, news, tools, and meetings ("What's New"), and a vast set of carefully annotated links to important research and other information on patient safety ("The Collection"). Supported by a robust patient safety taxonomy and web architecture, AHRQ PSNet provides powerful searching and browsing capability, as well as the ability for diverse users to customize the site around their interests (My PSNet).

PSNet Authoring Tool: The PSNet authoring tool is an internal facing web-based authoring tool used to publish content to PSNet.

WebM&M: WebM&M (Morbidity and Mortality Rounds on the Web) is an online journal and forum on patient safety and health care quality. This site features expert analysis of medical errors reported anonymously by users in the health care community. It also provides interactive learning modules on patient safety ("Spotlight Cases"), and Perspectives on Safety. Individuals may visit the website, register a profile, and take continuing medical education (CME) and continuing education unit (CEU) tests for credit.

Describe the type of information the system will collect, maintain (store), or share.
The GMPS is composed of the following:

NGC: NGC provides objective detailed information on evidence-based clinical practice guidelines. The source of the information is derived from guidelines developed by organizations representing health care providers and practices, health plans, state and federal agencies, and others NGC also collects information from individuals to allow for customization of information on the website, to receive personalized email updates of NGC information, and to support posting of user comments on select content.

NQMC: NQMC provides objective and detailed information on quality measures; the quality measures included in NQMC are developed by researchers, accreditation organizations, public and private organizations that pay for health care, integrated delivery systems and others. NQMC also collects information from individuals to allow for customization of information on the website, to receive personalized email updates of NQMC information, and to support posting of user comments on select content.

HMIS Public Facing Site: The HMIS public facing site presents information about quality measures in use or in development by HHS and its agencies.

HMIS Accessed Controlled Site (ACS): ACS stores information about measures in use or in development by the agencies of HHS for health care quality measurement, improvement, and reporting. The information about the measures is entered by government staff with permissions to do so solely from authors. The HMIS ACS collects the name and email address of the authorized government agency staff that use the HMIS to author and publish content to the HIMS public-facing site.

PSNet: PSNet offers weekly updates of patient safety literature, news, tools, and meetings ("What's New"), and a vast set of carefully annotated links to important research and other information on patient safety ("The Collection"). The system also collects information solely from individuals to allow for customization of information on the website and to receive personalized email updates of NGC information.

WebM&M: The WebM&M collects an email address from any individual who submits a case for use on the site. The system collects PII from any individual who voluntarily signs up to take on-site quizzes in order to gain CME/CEU (continuing education) credits.

Orbital/PSNet Authoring Tool: This tool collects the name and email address of any government contractor who will use the site to author and publish content about healthcare research and related quality measure research.

Youtube videos that provide technical assistance regarding overall system. Voice is collected in order to provide this assistance and access to Youtube support is granted by clicking a link from the website.

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

NGC collects and maintains structured, detailed information on evidence-based clinical practice guidelines. NGC also collects the name and email address of any individual who chooses to create a profile in order to customize information on the site, receive personalized email alerts, and support posting of user submitted comments on select content.

NQMC collects and maintains structured, detailed information on health care quality measures and it collects the name and email address of any individual who voluntarily chooses to create a profile in order to customize information on the site, receive personalized email alerts, and support posting of user submitted comments on select content.

HMIS collects and maintains structured information about health care quality measures in use or in development by HHS and its agencies; it also collects the name and email address of authorized government staff who use the HMIS to author and publish content to the HIMS public-facing website.

PSNet: The system collects the e-mail addresses of any individuals who voluntarily signs up to receive site-related newsletters, or to create a profile in order to tailor her interactions with the sites and receive personalized email alerts.

WebM&M: The system collects PII from any individual who voluntarily signs up to take on-site quizzes in order to gain CME/CEU (continuing education) credits; name, email address, address, phone (optional), date of birth, phone number, degree, and specialty of practice. The system also maintains records of past quizzes taken, including results and credits earned. All information collected in relation to CME/SEU is shared with the accrediting organization, the Accreditation Council for Continuing Medical Education (ACCME), to validate that an individual has completed the training and test requirements for credit award.

Orbital/PSNet Authoring Tool: This tool collects the name and email address of any government contractor who will use the site to author and publish content about healthcare research and related quality measure research to NQMC, HMIS, and NGC, respectively.

Youtube videos that provide technical assistance regarding overall system. Voice is collected in order to provide this assistance and access to Youtube support is granted by clicking a link from the website.

The system also collects AHRQ employee and direct contractor information, including the AHRQ email and password, to provision account access for these individuals who act as developers and administrators for the system.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Date of Birth

Name

Biometric Identifiers

E-Mail Address

Mailing Address

Phone Numbers

Education Records

HHS user credentials or employees and direct contractors (username and password)

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Employees

Public Citizens

Vendor/Suppliers/Contractors

How many individuals' PII is in the system?

10,000-49,999

For what primary purpose is the PII used?

PII is collected to allow the creation of personal profile and site customization and to send email alerts on requested topics, to allow the creation of personal profile and site customization and to send email alerts on requested topics, to send email newsletters to subscribers, to register a user in order to be able to take continuing education quizzes to earn credits, and to publish content. User credentials collected from AHRQ employees and direct contractors are used to provision account access for development and maintenance tasks.

Describe the secondary uses for which the PII will be used.

None.

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

Other HHS OpDiv

Non-Governmental Sources
Public

Private Sector

Identify the OMB information collection approval number and expiration date
OMB approval # 0935-0106; 02/14/2018

Is the PII shared with other organizations?
Yes

Identify with whom the PII is shared or disclosed and for what purpose.

Private Sector
Other: WebM&M – Data is volunteered by users who wish to earn continuing education credits (CME/CEU). Data is shared with the accrediting agency: Accreditation Council for Continuing Medical Education (ACCME).

Describe any agreements in place that authorizes the information sharing or disclosure.
Users that choose to share their test data for continuing education credits are alerted to the use of this information prior to the information being sent. There are no agreements in place between AHRQ and ACCME that pertain to the sharing of this data.

Describe the procedures for accounting for disclosures.
Individuals that wish to receive CME/CEUs can provide their information through WebM&M. The information is disclosed with permission to ACCME, and a record of each submission is kept as continuing education quizzes to earn credits, and to store quiz results and earned credit information shared with the accrediting organization.

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.
NGC/NQMC/HMIS/PSNet: Consent is provided by actively opting into providing information, or by creating an account in the system, which requires providing an email address and name. However, users are not required to submit data to access the information on any of the websites. Individuals are notified at the point of collection how their PII will be used to customize their experience on the websites. Users of WebM&M may volunteer PII in order for the program to share data for CME/CEU credits, however individuals can self-report credits directly with ACCME. There is no additional process to notify individuals.

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.

NGC/NQMC: Individuals actively sign up, thereby exercising choice. There are no negative consequences for not signing up. Subscribers can opt out of receiving personalized emails at any time. Once a year, all subscribers are asked to confirm whether they want to continue to receive emails.

PSNet/WebM&M: Individuals actively sign up, thereby exercising choice. There are no negative consequences for not signing up. Subscribers can, using a checkbox on the site, opt out of receiving personalized emails. E-mails all have unsubscribe options. Once a year, all subscribers are asked to confirm whether they want to continue to receive emails.

Orbital/PSNet Authoring Tool/HMIS ACS: Individuals who are required to use these tools to perform their jobs cannot opt out of providing an e-mail address and name. If individuals choose to have their PII removed from the system they may contact the system owner.

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

NGC/NQMC: The FAQs include a description of how PII is being used for tailored alerts, homepage and dashboards. Should major system changes take place, an email is sent to all subscribers to alert them of the change.

PSNet/WebM&M: The FAQs include a description of how PII is being used for tailored alerts, homepage and dashboards. Should major system changes take place, an email is sent to all individuals that current user these services. In addition, individuals that volunteer personal information to seek CEM/CEU credits are alerted by the ACCME when credit is awarded. This information is strictly used for this particular purpose and currently there is not plan to notify individuals of any anticipated change to the use of this PII.

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.

All individuals that use the GMPS have the ability to contact the system owner to address a concern or an issue with the inappropriate collection, use or disclosure of PII. In addition, individual may review their PII with the system owner to correct any inaccuracy in the data, and to verify the use of their PII within the GMPS.   Individuals that use GMPS may review their PII with the system owner to correct any inaccuracy in the data.

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

Subscribers who request email alerts are emailed annually to verify that they wish to retain their dashboards and alerts. Individuals that wish to review their CEM/CEU request may contact the system owner to ensure the accuracy of the data, however, there is no process in place to review individuals test score or report to the ACCME after the initial use of this information. In addition, there are no measures in place to periodically review data to ensure the integrity or relevancy of data after initial collection.

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

Users:

A site user can access their PII (e.g. email address) for the purpose of updating it. Users can access only their PII, not that of other users.

Administrators:

In order to change users' PII per their request and to maintain system operations.

Developers:

To perform development tasks within the system architecture.

Contractors:

Direct AHRQ contractors who perform roles of system developers and administrators.

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

PII within the system is only accessible by system administrators and system developers. The system owner must approve these individuals before account access to the system is provisioned for them.

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.

Access is strictly controlled to data related to information systems. Access to data is only provided to the required personnel necessary to complete work under the associated contracts. In addition, project personnel who work with the data are required to complete security training on a regular basis. Data are not made available outside the system's access-controlled environments and only used for the purposes of development and testing of the associated systems as related to work under the contract. In the event of a data refresh from the production system for the development and testing environments, data are scrubbed of PII prior to being made available for development and testing.

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 personnel who have access to PII are required to complete the AHRQ Information Security & Privacy Awareness Training, which includes extensive information how what PII is, why it needs to be protected, and how to protect it.

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

None.

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 National Archives and Records Administration (NARA) retention schedule for GMPS can be found under Record Control Schedule N1-510-09-002. Education records are disposed of at the end of the calendar year in which information is collected 111 the resource ISpublished to the public. All other records are disposed of three years after collection or whenever no longer needed for business purposes.

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

Access to system servers is controlled by Active Directory policy. Unsuccessful login attempts are logged on the servers and access to the system is limited to maintenance using approved access. To gain access users must demonstrate that there is a need to know, that the approved security requirements have been met, that the accessing system does not compromise the existing security of the network or host AHRQ system, and that it complies with AHRQ standards.

The system uses the Operating System event log for errors, warnings and information events. Application, security and system events are logged. Supporting servers and appliances (such as switches, routers, and firewalls) also log error events using a mechanism known as "syslog". Error events are automatically e-mailed to on-call system support staff. All individuals present in the data-center where the system is hosted must wear an access badge. Anyone without the proper badge will be required to immediately exit the data-center. Access records and video surveillance records are retained a minimum of three months.

Identify the publicly-available URL:

NQMC: http://www.qualitymeasures.ahrq.gov/

NGC: http://www.guideline.gov/

HMIS: http://www.qualitymeasures.ahrq.gov/hhs/index.aspx

PSNet: http://psnet.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?
No

Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?
Yes