

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

05/15/2017

**OPDIV:**

HRSA

**Name:**

BHW Management Information System Solution

**PIA Unique Identifier:**

P-7664500-803392

**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?**

Existing

**Does the system have Security Authorization (SA)?**

Yes

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

Significant System Management Change

Addition of BMISS Extranet subsystem

**Describe in further detail any changes to the system that have occurred since the last PIA.**

The Bureau of Health Workforce (BHW) Management Information System Solution (BMISS) replaced the Bureau of Health Care Delivery and Assistance NET system (BCHDANET). BCHDANET and its numerous digital and non-digital systems, which formerly supported the BHW Loan and Scholarship Programs, became difficult and expensive to maintain and meet changing needs.

An additional function was added to the BMISS platform that is called the Shortage Designation Management System (SDMS). SDMS replaces the Application Submission and Processing System (ASAPS). The replacement of ASAPS allows the BWH to recognize greater efficiency, data quality improvement and reduced costs. SDMS is a map-based system for Primary Care Officers to create and manage designations for Health Provider Shortage Areas (HPSAs) and Medically Underserved Area and Populations (MUA/Ps).

A new subsystem has been added to the BMISS system. The BMISS Extranet Health Workforce Connector (HWC), which is the successor to the former National Health Services Corporation Jobs Center, is designed to be a job search platform which allows participants of BHW's loan repayment programs (LRPs) and scholarship programs (SPs) to search for open positions at sites located in areas of need. Although the Connector is geared towards BHW's program participants, the website is open to the general public, and allows anyone to search for jobs at over 20,000 medical facilities across the nation.

**Describe the purpose of the system.**

The BHW Management Information System Solution (BMISS) platform provides automated support for loan and scholarship programs, and maintains a database of healthcare delivery sites and school information. Business areas that BMISS supports include: online application submission, review and award for multiple Scholarship and Loan Repayment programs, Health Site online application submission, review and approval, School data and financial details, in-school, in-training, and In-service monitoring, legal and compliance monitoring, Ambassador contact and program support information, loan data, payment calculations and tax records.

The Shortage Designation Management System (SDMS) was added to the BMISS platform in recent years in order to process Health Professional Shortage Area (HPSA) designations and mappings. SDMS is a map-based system for Primary Care Officers to create and manage designations for HPSAs and Medically Underserved Area and Populations (MUA/Ps). Business areas that SDMS supports include HPSA designation submissions and approvals.

The Health Workforce Connector (HWC) was added as part of BMISS Extranet subsystem in Spring2017. The HWC allows BHW's participants to search for open positions at sites located in areas of need. It is designed to be a job search platform which allows participants of BHW's Loan Repayment Programs (LRPs) and scholarship programs (SPs) to search for open positions at sites located in areas of need.

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

HRSA's Bureau of Health Workforce (BHW) and stakeholders such as Primary care offices, Sites, Applicants, Participants, and Ambassador currently review, update and maintain data specific to the Nation Health Service Corps Loan Repayment Program (NHSC LRP), the Nation Health Service Corps Scholarship Program (NHSC SP), the Nursing Corps Loan Repayment Program (NCLRP), Faculty Loan Repayment Program (FLRP), and the Nursing Scholarship Program (NSP).

All external BMISS users can call the BMISS call center whose staff has been trained to manually enter the inquiries in BMISS. The call center is a separate system from BMISS and is managed by Verizon. Also, applicants may submit inquiries online within BMISS allowing HRSA internal officers to provide answers directly through the system in a secure way. The phone number is to the BMISS Call Center which is managed by Verizon call center staff who has limited access to BMISS to assist users with the following:

- Reset passwords
- Update email addresses
- Assist in resolving technical issues with the applications or within the portal
- Enter inquiries on behalf of customers
- Answer program questions

BMISS provides a process for staff to edit and manage the data, and provides functionality facilitating ranking of applications, selecting potential awardees, confirmation of interest, and the calculation and processing of award financial information.

BMISS processing collects the following application data:

Name

Address(es)

Telephone number(s)

Email address(es)

Social Security Number (SSN)

Date of Birth (DoB)

Loan Information

Employment information

Commercial credit reports

Educational data

Medical data

Financial data

Payment data

Discipline and Specialty

Health Professions Licensure

Tax information

Military status

Personal Statement

Experience

Training and Certifications

An interface between BMISS and UFMS has been established. The interface works as a drop box process without a direct link to either system. Files are picked-up and processed manually. UFMS provides tax documents to BHW program participants regarding the funds provided by HRSA for their service. Using the interface, BMISS exports the following information to UFMS: SSN, tax year, whether the user wants to receive their tax documents electronically or by mail, and the amount of loans the user owes to banks.

Program participants have the option to receive hard copy tax documents or to receive them electronically. If the participant elects to receive an electronic version, UFMS passes the individual's tax document to BMISS in a file and BMISS provides the document in a secure environment.

UFMS is managed by the Program Support Center (PSC). The PSC is the largest multi-function shared service provider to the federal government. It is hosted by HHS/OS/ASFR/Office of Finance and covered by their PIA.

PII collected from users/system administrators in order to access the system consists of user credentials.

The system collects National Provider Identifier (NPI). It is an optional field that is used primarily for reporting purposes so we can track the applicants after they apply to one of BMISS programs.

The Health Workforce Connector collects Professional and Education information – including but not limited to collection of employment, training, education, and certification information and gives the user the ability to control privacy settings. The following type of information are collected:

Personal Information - location, title, field of practice, email address, phone number

Experience - Residency location, position, time period

Training and Certifications

Picture, email address, phone number

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

BMISS is used to collect personal, site, school, and financial information from Applicants, Schools, Sites, Participants and program stakeholders via a web-based front end and provides the ability to review, update and manage the data as well as record and update inquiry, compliance and self-service related information during and after participation in a BHW Loan Repayment or Scholarship program.

Program stakeholders of BMISS are: Nation Health Service Corps Loan Repayment Program (NHSC LRP), Nation Health Service Corps Scholarship Program (NHSC SP), Nursing Corps Loan Repayment Program (NCLRP), Faculty Loan Repayment Program (FLRP), Nursing Scholarship Program (NSP)

The data collected contains, and is not limited to: mandatory personal information related to the applicant, SSN, address, and school information, DOB, military status, credit report, address, phone number, email address, first and last name, DOB, emergency contact (names, phone number, email address), marital status, ethnicity, gender, language, race. Inquiries are sent by phone and via application.

The Health Workforce Connector (HWC), which is the successor to the former NHSC Jobs Center, is designed to be a job search platform which allows participants of BHW's loan repayment programs (LRPs) and scholarship programs (SPs) to search for open positions at sites located in areas of need. Although the Connector is geared towards BHW's program participants, the website is open to the general public, and allows anyone to search for thousands of jobs at over 20,000 medical facilities across the nation.

Site Admins (also called Site POC's) need the following information in order to review the applicant's skills, experience, etc. for that site's openings:

Personal Information - location, title, field of practice, email address, phone number  
Experience - Residency location, position, time period Training and Certifications  
Picture, email address, phone number

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

Yes

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

Social Security Number

Date of Birth

Name

E-Mail Address

Mailing Address

Phone Numbers

Medical Notes

Financial Accounts Info

Certificates

Education Records

Military Status

Employment Status

Taxpayer ID

Health Professions License Number

Credit Report

Marital status, ethnicity, gender, language, race, credentials, employment record, and financial record

National Provider Identifier (NPI)

Additional information collected by BMISS Extranet is listed below (User has the option to not allow access to his profile by anyone other than himself/herself):

Professional and Education information – includes collection of employment, training, education, and certification information and gives the user the ability to control privacy settings.

Personal Information - location, title, field of practice, email address, phone number

Experience - Residency location, position, time period

Training and Certifications

Picture, email address, phone number

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

Employees

Public Citizens

**How many individuals' PII is in the system?**

100,000-999,999

**For what primary purpose is the PII used?**

BMISS uses individual's PII for the following purposes:

To identify and select qualified individuals to participate. The process includes verifying program applicant's or participant's credentials and educational background, previous and current professional employment data and performance history information. The process also verifies that all claimed background and employment data are valid and all claimed credentials are current and in good standing from selection for an award through the completion of service, perform loan repayment and scholarship program administrative activities, including, but not limited to, payment tracking, deferment of the service obligation, monitoring a participant's compliance with the service requirements, determination of service completion, review of suspension or waiver requests, default determinations, and calculation of liability upon default.

To monitor the services provided by the programs' healthcare providers.

To transfer information to the Unified Financial Management System (UFMS) for purposes of effecting payment of program funds (through the Department of the Treasury) and preparing and maintaining financial management and accounting documentation related to obligations and disbursements of funds (including providing notifications to the Department of the Treasury) related to payments to, or on behalf of, awardees.

The system collects user credentials from system users/administrator in order to access the system.

To support a job search platform that allows participants of BHW's loan repayment programs (LRPs) and scholarship programs (SPs) to search for open positions at sites located in areas of need. Although the Connector is geared towards BHW's program participants, the website is open to the general public, and allows anyone to search for jobs at over 20,000 medical facilities across the nation. These medical facilities, also known as 'sites', each feature a 'site profile' containing a variety of information intended to educate the viewer and inform them of any open opportunities at the site.

To support search by the Site POCs to review applicant profiles for job openings at the site. The search can only be based on type of skill requirements and not on individual names.

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

Research, Statistical information

**Describe the function of the SSN.**

Required to make payments to awardees, for Tax documentation and matching of records between BMISS and external systems (i.e., HHS Program Support Center (PSC)).

**Cite the legal authority to use the SSN.**

IRC (Internal Revenue Code) 6109

Section 846 of the Public Health Service Act, as amended

**Identify legal authorities governing information use and disclosure specific to the system and program.**

Section 846 of the Public Health Service Act, as amended

**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.**

09-15-0037, HHS/HRSA/BHW Scholarship and Loan Repayment Program Records

**Identify the sources of PII in the system.**

**Directly from an individual about whom the information pertains**

Hardcopy

Email

Online

**Government Sources**

Within OpDiv

Other Federal Entities

**Non-Governmental Sources**

Public

**Identify the OMB information collection approval number and expiration date**

OMB Control No. 0915-0301; Expiration Date: 05/31/18  
OMB Control No. 0915-0150; Expiration Date: 11/30/18  
OMB Control No. 0915-0127; Expiration Date: 01/31/17  
OMB package submitted as of 1/5/2017, pending approval.

Current forms associated with this package may still be used while awaiting official OMB approval.

OMB Control No. 0915-0140; Expiration Date: 04/30/17  
OMB Control No. 0915-0337; Expiration Date: 06/30/17  
OMB Control No. 0915-0146; Expiration Date: 07/31/17  
OMB Control No. 0915-0388; Expiration Date: 08/31/17  
OMB Control No. 0915-0230; Merged into No. 0915-0127 above.

**Is the PII shared with other organizations?**

Yes

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

**Within HHS**

Unified Financial Management System (UFMS) - for taxing purposes.

**Other Federal Agencies**

Program Support Center (PSC) - PSC is responsible for UFMS.

**Private Sector**

Primary Care Offices (PCOs)- names and contact information of Program participants are made available since the participant will be working at a site managed by the PCO.

**Describe any agreements in place that authorizes the information sharing or disclosure.**

BMISS holds a Memorandum of Understanding (MOU) between Office of Program Management and System Policy (for Unified Financial Management System (UFMS)) and Health Resources and Services Administration (for BMISS), to ensure the integrity and availability of the data that is shared between the two systems.

**Describe the procedures for accounting for disclosures.**

BMISS tracks every transaction that is sent to UFMS. This transaction report can be retrieved upon request.

**Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.**

Awardees and potential awardees are informed of what PII is collected during the application process and on the BHW (formerly BCRS) website.

It is not required for user credential PII.

User enters PII as a part of an interactive on-line session.

**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.**

Prior to actually registering, individuals are asked to read the rules of behavior, non-disclosure, and Acceptable Use Policy posted on the site.

They can only proceed into the system if they choose the "I ACCEPT" button on-screen which allows them to move forward. If individuals choose not to accept, then they are returned to the general information screen. Since this system is based on cycles, the 'I Accept' data field, stored in the database, is checked for each new cycle year and forces them to re-acknowledge/re-accept. If changes occur to the Rules of Behavior, Non-Disclosure, and Acceptable Use Policy posted on the site during a new cycle year, then the updated notifications are posted on the site for the user to read during logon.

For the BHW Connector, one of the screens, Privacy Settings, gives the user the option to make her/his profile to be Public or Private. If the user selects the Private option, no one is able to look at that user's profile except the user himself/herself.

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

If any major change to the system, in regards to information sharing, occurs, the system will be used to notify the participants of the change via email and/or a popup notification upon login.

It is not required for user credential PII.

For the BHW Connector application, a screen is presented to the user for consent. If the user clicks "OK" button, then the user is presented with the login screen to proceed further. If the user selects "X", then the user is taken back to the previous screen.

**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.**

Applicants or participants can contact the BHW Customer Care Center at 1-800-221-9393 Use TTY for hearing impaired: 1-877-897-9910 Monday-Friday (except Federal holidays), 8:00 am to 8:00 pm ET or email at [GetHelp@hrsa.gov](mailto:GetHelp@hrsa.gov) if they have concerns about the use of their PII.

It is not required for user credential 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.**

PII is presented to the participants of the program within the BMISS web portal. The participants have the ability to verify only integrity, availability, accuracy and relevancy of their PII. If there are any issues with the data, the participant can submit a request to have the data updated.

The system users/administrators use Active Directory as their user credentials.

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

**Users:**

Anyone from the public applying to the application may see their own information.

**Administrators:**

Internal analysis.

**Developers:**

During design and development work.

**Contractors:**

NIH; CIT; Sapient: Direct contractors provide production support for the system and are required to have access to PII to resolve data issues such as an incorrect SSN or contact information, at the request of the PII owner.

**Others:**

Site Admins to review user profile for job opportunities



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

A HRSA internal user who needs access to the system must have a position that requires access to that data and be approved by the internal officer's manager to have access to that data.

The developers working on the system must obtain an approval from their managers and BHW.

For the Connector application, the Site POCs can access and review individual user profile for open positions at their site. System administrators also have access to the individual user profile.

**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 to PII is role based and only specific roles have access to PII. Only select analysts have access to SSN and Birth dates.

**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 users are required to complete HRSA annual security awareness training.

The annual awareness training is required only for (internal) HRSA personnel such as admins and contractors, but not for external (public) users.

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

There is no additional privacy training beyond what is provided by HRSA.

**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.**

In order to dispose of the sensitive information when printed, it must be shredded. Additional information regarding retention and destruction of PII will be finalized during development of the records management portion and the SORN for this system. The Records Management Officer has been consulted and we are working with Records Management Officer to obtain the appropriate records and retention schedule.

Records are retained and disposed of as follows: Files concerning participants who complete their obligations or whose obligations are waived, cancelled, or terminated are transferred to the Washington National Records Center in Suitland, Maryland and are destroyed 6 years after final payment, under disposition schedule HSA B-351 3. 1.

HRSA has digitized and uploaded paper files concerning active participants in BHW scholarship and loan repayment programs into BMISS. The paper files are stored at the Washington National Records Center and are destroyed 15 years after closeout, under disposition schedule N1-512-92-01, item 25P 1 and 2.

Unfunded or withdrawn applicant records are destroyed 6 months after the close of each fiscal year application period, under disposition schedule N1-512-92-01, item 25P 1.

Currently, all records migrated to BMISS or created in BMISS are retained indefinitely, pending NARA's approval of a revised schedule.

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

BMISS consists of a multi-tier architecture using a Windows environment with a custom front-end developed at HRSA, a second tier of application servers, and a third tier of databases to encrypt and store data. All servers are configured to HHS security guidelines and reside at a secure data center managed by NIH.

Applicants and vendors access the system via the Internet, and register for a login and password to ensure that responsibility for data can be attributed to an individual. HRSA employees (and direct contractors) can only access the internal system via the HHS Intranet which requires dual factor authentication.

Communication between components is controlled through the use of Virtual LANs over TCP/IP protocol. Applicants and vendors connect over the Internet via secure HTTP (https) using digital certificates and FIPS compliant SSL encryption to protect data in transmission. Internal users connect over the HHS Intranet via secure HTTP (https) using digital certificates and FIPS compliant SSL encryption to protect data in transmission.

Physical controls: Rooms where records are located are locked when not in use. During regular business hours, rooms are unlocked but are controlled by on-site personnel. Security guards perform random checks on the physical security of the offices (storage locations) after duty hours, including weekends and holidays.

Databases are hosted in NIH data centers at Building 12 and Sterling data centers where physical security are provided.

**Identify the publicly-available URL:**

<https://nhscjobs.hrsa.gov/external/search/index.seam>

<https://programportal.hrsa.gov/extranet/landing.seam>

**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.

**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?**

No