

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

09/26/2016

**OPDIV:**

AHRQ

**Name:**

Effective Healthcare System

**PIA Unique Identifier:**

P-1978489-313877

**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?**

No

**Does the system include a Website or online application available to and for the use of the general public?**

Yes

**Identify the operator.**

Agency

**Is this a new or existing system?**

New

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

Yes

**Describe the purpose of the system.**

The Effective Health Care (EHC) Program funds individual researchers, research centers, and academic organizations to work with the Agency for Healthcare Research and Quality (AHRQ) to produce patient-centered outcomes research (PCOR). The EHC Program reviews and synthesizes published and unpublished scientific evidence, generates new scientific evidence and analytic tools, and translates research findings into useful formats for clinicians, consumers, and policymakers. EHC Program products can be used to improve the quality of health care and facilitate evidence-based health care decision-making. The system supports a website that allows EHC to communicate this research, products, and other informational research for public consumption.

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

The system collects information, in the form of email, for users of the website to receive email updates regarding program milestones, news, and new research summaries or announcements are released.

The system also collects information, including a first name, last name, title, organization name, and email address to allow for individuals to submit a research topic or to comment on a draft research publication. Users may also request scientific information packets (SIP), which are packages of anonymous information about a particular health topic, such as diabetes, infectious diseases, or substance abuse. To request this information individuals provide a first name, last name, title, phone, company address, and email. In addition, the system collects the point of contact name for Evidence-based Practice Centers (EPC) that is listed along with the EPC name. EPCs are research groups that produce comparative research and effectiveness reviews on medications, devices, and other health care services. Finally, the system maintains AHRQ employee and direct contractor usernames and passwords for the purpose of provisioning accounts for system administration and development.

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

The Effective Health Care (EHC) Program website is primarily for public informational purposes, and content is made available to the public. Information provided through the website includes research summaries for consumers, clinicians, and policymakers; tools and resources; research available for comment; collecting suggestions for further research; the ability to submit scientific information packets; comparative effectiveness research; EHC news and announcements; and organizational information.

The research summaries for consumers, clinicians, and policymakers component provides free research summaries about the benefits and risks of different treatments for different health conditions. These summaries are based on the collection of comparative effectiveness reviews that cover health topics suggested by the public. The tools and resources component offers a wide array of tools and resources to help consumers, clinicians, policymakers, and others make more informed health care decisions. The research available for comment and submit a suggestion for research components by nominating a potential topic for future research reviews and collecting scientific information packets (SIPs) on selected health topics. The news and announcements Component provides general announcements about webcasts and conferences, funding opportunities and other news from Effective Health Care Program. The website also provides general organizational information around the EHC Program.

**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

Mailing Address

Phone Numbers

System administrator and developer username and password

Title

Organization Name

**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?**

500-4,999

**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 EHC research topics. 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**

0935-0128; 2/2013 (pending renewal)

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

Yes

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

**Within HHS**

AHRQ program staff respond to inquiries or topic suggestions submitted by members of the public.

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

Voluntary, limited PII is shared/disclosed only within the EHC system itself, the related Evidence-based Practice Centers (EPCs), the Scientific Resource Centers of the EHC project, the AHRQ EHC 'Contact Us' distribution list, and among other selected and approved administrators.

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

Some user submissions are transmitted from the database to the appropriate EHC Program Manager via email. The train of email correspondence can be tracked to account for disclosures. Other user submissions (e.g., comments on draft documents) are posted on a secure site accessible only to internal program staff and relevant supporting direct contractors.

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

Consent is implicit when individuals voluntarily submit their data in order to receive updates, comment on a draft research project, post a point of contact related to a specific EPC, or to request additional research materials. Each use of PII is explained on the website with instructions on how to provide PII for individuals to review. PII is not used for any other purpose other than the stated purpose upon collection. AHRQ employees and direct contractors are aware that they must submit their data in order to be provisioned a user account for access to the system.

**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.**

Individuals do not have to input PII in order to see EHC updates through the EHC website. Individuals that would like to submit comments to draft research are not required to submit PII to submit comments anonymously. Individuals that would like to request SIPs may choose to call the EHC Program directly to request the information. Individuals may also elect not to be named as a point of contact for EPCs for a specific piece of posted research. Direct contractors, in the role of system administrators and developers, are required to provide their PII for system account provisioning, therefore there is no opt-out for the collection of this information.

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

PII used for emailing updates, requesting SIPs, being named as a point of contact, or to comment on draft research is only used for these purposes. There are no determinations made about individuals based upon the collected PII. As a result, there is no process in place to notify and gain consent when major changes occur to the system. However, individuals that receive email updates about the EHC program, and individuals that use the EHC website, will receive program updates via email and the website. Direct contractors, in the role of system administrators and developers, provide their PII for the sole purpose of account provisioning. Therefore, any major changes that occur will not affect the account provisioning of these individuals, and no notification to obtain consent is provided.

**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 an individual or system administrator is concerned about the use or accuracy of their PII in any form, the individual may contact the EHC Program directly to address their concern. The system owners, along with program managers, have the ability to resolve any concerns regarding the use of 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.**

Individuals voluntarily submit their PII in order to interact with the EHC Program. The intended uses of PII are for communication directly with the individual and to provision user accounts for the system, and PII is not used to make determinations about individuals. Individuals who would like to update their PII may contact the EHC Program directly to request an update, however there is no procedure in place to review PII periodically to determine the integrity, accuracy, or relevancy of the PII.

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

**Administrators:**

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:**

Developers have access to the system to provide system maintenance, ensure system operations, and maintain the system website.

**Contractors:**

Direct contractors serve as system administrators and developers for the system.

**Others:**

Program managers of the AHRQ-managed EHC distribution list at [effectivehealthcare@ahrq.hhs.gov](mailto:effectivehealthcare@ahrq.hhs.gov).

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

The system owner provisions and approves all accounts for individuals to access the system. All user roles and level of access to PII is determined by a need to know in order to perform system administrator and developer roles. When roles change within the system as a result of a completed project or a role that is no longer required, the system owner will remove access to PII for that role. EHC Program Managers will only receive a minimal amount of PII, in the form of contact information, regarding specific individual requesting information about an aspect of the EHC Program. System administrators and developers are approved by the system owner to gain backend access to service the system.

**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 system owner reviews all account requests and the roles for access within the system, including roles that require access to PII. The system owner reviews or approves any role to ensure that individuals require access PII to complete system administration or system development activities. When projects or development tasks are complete the system owner removes access to the system, including the roles associated with PII, to ensure that access is limited to PII only for the duration of their job requirement.

**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 receive annual privacy and security training as required by AHRQ.

**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.**

Records are destroyed five years after cutoff at the end of the calendar year when a decision is made to accept or decline a nomination according to National Archives and Records Administration (NARA) NI-510-09-11.

**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 processes to eliminate a leaving employee or contractor. Every departing user is required to fill out a form that describes the disposition of the network identity and electronic mail files. The technical controls used on this system include controls for the flow and protection of information. Only administrators that have to have access to some information are granted access. Examples used but not limited to are managing security groups, ports and protocols, connections and IP addresses. 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://effectivehealthcare.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