

Date Signed: 9/16/2020

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:	1192348	Title:	HRSA - Computerized Hand and Foot Screening
PIA Name:	HRSA - CHAFS - QTR3 - 2020 - HRSA611595		
OpDIV:	HRSA		

PTA

PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance
PTA - 1B:	Is this a FISMA-Reportable system?	Yes
PTA - 2:	Does the system include a website or online application?	No
PTA - 2A:	Are any of the URLs listed accessible by the general public (to include publicly accessible login and internet websites/online applications)?	

URL Details

Type of URL	List Of URL	
Other	http://www.cibmtr.org/	
PTA - 3:	Is the system or electronic collection, agency or contractor operated?	Agency
PTA - 3A:	Is the data contained in the system owned by the agency or contractor?	
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	1/3/2019
PTA - 5B:	If no, Planned Date of ATO	9/29/2017
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?	Computerized Hand and Foot Screening (CHAFS) is a web-based system to record patience???'s progress in the National Hansen's

		<p>Disease Program (NHDP). The HRSA user will examine the patient outside of the system and record the findings in CHAFS. Data is stored by using the patient's first name, last name, and date of birth. The information being collected is comprised of patient's nerve sensitivity response of their hands and feet. The system also allows the HRSA user to generate reports to see patient's progress over time. CHAFS is an internal application and not open to the public.</p>
<p>PTA - 9:</p>	<p>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.</p>	<p>The system collects and stores Patient's First Name, Last Name, Date of Birth, and Patient File Number. Additionally, the system collects Sensory, Skin, Muscle, and Nerve Palpation, and deformity testing results. The data is available only to users who have been granted access to the system. These users are HRSA employees and will gain access through the Access Management System (AMS) and have active HRSA PIV cards.</p>
<p>PTA - 10:</p>	<p>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</p>	<p>The National Hansen's Disease Programs (NHDP), based in Baton Rouge, Louisiana, is primarily responsible for inpatient and outpatient care and treatment of Hansen's disease (leprosy). In addition to the clinical programs in Baton Rouge, the NHDP also coordinates outpatient care for Hansen's disease patients throughout the U.S. at Healthcare Systems Bureau (HSB) grant funded clinics as well as private physician offices. The NHDP conducts professional education programs for U.S. and international health care workers, providing basic information that is not provided in standard medical curricula. The NHDP also operates state of the art, world renowned laboratory research programs dedicated to improved detection, treatment and prevention of Hansen's disease and its associated effects. To provide for ease of management for Physical Therapy/Occupational Therapy (PT/OT) assessments and care. A web-based system called CHAFS (Computerized Hand and Foot Screening) is being developed using .NET Framework, Internet Information Services (IIS), and Structured Query Language (SQL) Server. Sensory Testing data is collected to gauge the patient's response to filament being pressed onto their skin at various points. Skin Inspection is a visual inspection of the skin condition documenting wounds, callus, swelling, redness, dryness, temperature, missing, and contracture. Muscle Testing is the patient's physical response to the physical therapist's applying pressure to the hands and feet. The physical therapist will record a value of either Strong, Weak, or Paralyzed. Nerve Palpation testing records a YES/NO value to whether or not the patient's limbs have blood flow. Deformity Testing records a YES/NO value to a physical inspection of the patient's extremities; looking for Open Wounds, Claw Toes, Equinus, Amputation/Absorptions, Drop Foot, and/or Charcot Foot.</p>
<p>PTA - 10A:</p>	<p>Are records in the system retrieved by one or more PII data elements?</p>	<p>No</p>
<p>PTA - 11:</p>	<p>Does the system collect, maintain, use or share PII?</p>	<p>Yes</p>

PIA

PIA - 1:	Indicate the type of PII that the system will collect or maintain	Name Medical records (PHI) Medical Records Number
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared	Patients
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?	Performance of duty to provide mission service to patients
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research)	To provide data for use in facility management, continuing education, Department initiatives, quality assurance activities and research at the National Hansen's Disease Program, Baton Rouge, Louisiana
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	Section 320 of the Public Health Service Act, as amended (42 U.S.C. 247e), the National Hansen's Disease Program; and section 326 of the Public Health Service Act, as amended (42 U.S.C. 253), Medical Services to Coast Guard, National Oceanic and Atmospheric Administration, and Public Health Service.
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.	09-15-0003, Contract Physicians and Consultants 09-15-0007, Patients Medical Record System Public Health Service Hospitals 09-15-0028, PHS Clinical Affiliation Trainee Records
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains In-person
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	No
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	Patients are provided written notification at the time of service as to the data collected, potential use and disclosure.
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	Patients are provided the option to opt-out of the collection or use of their Personally Identifiable Information (PII) by refusing service offered by the program.
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	Notification of major changes are posted to the Federal Register following the SORN process, with patients provided written notification updates at the time of service as to the data collected, potential use and disclosure. Alternatively, Deceased or Patient lost to follow up cannot be notified or have their consent obtained.
PIA - 15:	Describe the process in place to resolve an individual's concerns	Written notification must be sent to National

	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	Hansen's Disease Program that reasonably identifies the record, specifies the information to be contested, and states the corrective action sought, with supporting justification.
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	Review of PII data elements contained in the system are conducted during each encounter starting from the first day of service provided.
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users Administrators Contractors
PIA - 17A:	Provide the reason of access for each of the groups identified in PIA -17 Users Reasoning: Daily data collection as it relates to the mission and patient care Administrators Reasoning: Daily operations as it relates to system performance and availability to end users Contractors Reasoning: Daily data collection as it relates to the mission and patient care	
PIA - 17B:	Select the type of contractor	HHS/OpDiv Direct Contractor
PIA - 18:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	Supervisor initials and approves request for account creation to support job duties, and accounts are created with assigned internal role base controls based on identified job duties.
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	Role based controls are established within the system and assigned during account creation.
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	Annual department training and review at time of account creation and system access.
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	Verbal and written review of Laws, Regulations and procedures for handling and access system at the time of account creation.
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)	Retention and disposal: Job Number N1-512-92-2 Former Public Health Service Hospitals/Clinics: Destroyed 50 years after date of last treatment, inactive medical records for active-duty uniformed service personnel and non-uniformed service personnel. National Hansen's Disease Program: Retained at facility-not transferred to a Federal Records Center. Destroyed, as appropriate, after 50 years, or when no longer needed for research purposes, as determined by the project leader or principal investigator.
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 is secured on the system using the following controls: Safeguards:

Authorized Users: Health care practitioners, and other allied health personnel, medical and allied health students, and administrative personnel for determination of eligibility for care and facility management; qualified research personnel with approved protocol; Public Health Service Commissioned Personnel Operations Division; and Public Health Service Claims Officer.

Physical Safeguards: Magnetic tapes, discs, other computer equipment and other forms of personal data are stored in areas where fire and life safety codes are strictly enforced. All documents are protected during lunch hours and non working hours in locked file cabinets in double-locked storage areas.

Procedural Safeguards: A password is required to access the terminal and a data set name controls the release of data only to authorized users. All users of personal information in connection with the performance of their jobs protect information from public view and from unauthorized personnel entering an unsupervised office. Access to records is strictly limited to those staff members trained in accordance with Privacy Act safeguards. The contractor is required to maintain confidentiality safeguards with respect to these records.

The Memorandums of Agreement between the successor organizations and the Public Health Service require the successor organizations to comply with the Privacy Act. Public Health Service and HHS guidelines have been provided to each successor organization.

PIA - 25:	Describe the purpose of the web site, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response	Computerized Hand and Foot Screening is designed to assist with the documentation of Rehabilitation services in Hand and Foot assessment of patients under the care of the National Hansen's Disease Programs.
PIA - 26:	Does the website have a posted privacy notice?	Yes
PIA - 27:	Does the website use web measurement and customization technology?	No
PIA - 27A:	Select the type of website measurement and customization technologies is in use and if it is used to collect PII	
PIA - 28:	Does the website have any information or pages directed at children under the age of thirteen?	No
PIA - 28B:	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PIA - 29:	Does the website contain links to non-federal government websites external to HHS?	No