

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

05/31/2024

**OPDIV:**

AHRQ

**Name:**

Project Support System

**PIA Unique Identifier:**

P-7304267-080237

**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)?**

No

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

PIA Validation

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

N/A

**Describe the purpose of the system.**

The Project Support System (PSS) is a General Support System (GSS) that hosts all system functionality for the following three project components: Consumer Assessment of Healthcare Providers and Systems (CAHPS), Survey on Patient Safety (SOPS), and the Medical Expenditure Panel Survey Enclave (MEPS-ENCL). Three project components CAHPS, SOPS, and MEPS-ENCL make up PSS. This PIA reflects the PSS that hosts CAHPS, SOPS, and MEPS-ENCL data.

The CAHPS includes applications and information management processes developed to support the CAHPS program, as well as the Child CAHPS survey database. The CAHPS Database is to facilitate comparisons of CAHPS survey results by and among survey sponsors.

The purpose of the SOPS system is to disseminate guidelines for submission, manage the intake of survey questionnaires and data provided by various health organizations, and provide access to

comparative reports. These survey data are collected at the individual level but do not contain any information in identifiable form. Only a unique record level identifier along with survey responses to individual survey items is provided in the survey data files. In addition to survey data, the applications also collect administrative and characteristic data such as measurement year, health care organization name, sample size, frame size, survey methodology, and response rate. The PSS supports system functionality for MEPS-ENCL by collecting data on demographic information, health care use, health care expenses, health insurance coverage and the quality of medical care and preventive services received by the households. Households participating in the Medical Provider Component (collected outside of Westat) authorize the project (in writing) to request information from those doctors, hospitals, pharmacies, and other medical providers from which they received service. Data collected through MEPS is used for the construction of analytical variables and files which are delivered to AHRQ for publication.

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

The PSS stores, processes, and transmits a range of information that include the following: name, e-mail address, phone numbers, medical notes (medical condition, current health status, visits to healthcare providers, medication), military status, date of birth, mailing address, medical records number, employment status, AHRQ credentials (username and password), zip-code, sex, age, and race.

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

The PSS stores, processes, and transmits a range of information that include the following: name, e-mail address, phone numbers, medical notes (medical condition, current health status, visits to healthcare providers, medication), military status, date of birth, mailing address, medical records number, employment status, AHRQ credentials (username and password), zip-code, sex, age, and race.

The system includes applications and information management processes developed for the CAHPS program. It includes two web-based data submission applications: Health Plan Submission System and the Clinician Group Submission System and a public facing reporting web site called the CAHPS Comparative Database. Health Plan Data Submission Application is a password protected, web application designed to manage the intake of survey data provided by health plans or health plan survey vendors. Clinician and Group (C&G) Submission Application is a password protected, web application designed to manage the intake of survey data provided by Clinician Groups. Both systems enable users to obtain information related to the submission process, download submission guidelines and file layout specifications; register with the site to obtain a username and password; submit survey data files through the system in CSV or XML file format; obtain real-time file submission status reports in real-time that indicate whether or not the file was accepted or rejected by the system. If the file is rejected users can resubmit the file. PII is used to retrieve data from CAHPS, SOPS and MEPS-ENCL. Categories of individuals includes adults and children who PII is collected. Data elements collected include a range of information for hosted project information owners and includes public and private contact information (name, e-mail address, phone numbers), military status, employment status, data submitted by participants (e.g., individuals, organizations), aggregate and processed data, and reports. Surveys target populations of both adults and children, and information collected includes age, sex, and zip code to provide general metrics regarding age ranges, percentage of responders by sex, and regional indicators. Individuals who conduct project surveys have information collected to include name, phone number, mailing address that includes zipcode, and email address. The CAHPS Database does not include name, phone number, mailing address and email address for any individual survey respondent. The PSS also provides the system functionality to allow SOPS to collect survey data information provided by various health

organizations or vendors. The system provides guidelines for submission, manages the intake of survey questionnaires and survey data, and provides access to reports. These survey data are collected at the individual level but do not contain any PII. In addition to survey data, the applications also collect administrative and characteristic data such as measurement year, health care organization name, sample size, frame size, survey methodology, and response rate. The PSS also hosts the MEPS-ENCL Household Survey to collect the age, race, sex of each family member, military status, medical notes (medical condition, current health status, visits to health care providers), charges and payment for healthcare, employment, and health insurance type. The MEPS-ENCL also collects information on medical providers identified in the household survey, to include name, address, and phone number. Information about the individual conducting the interview is also collected to include name, phone number, email address. AHRQ employees and direct contractors that support the system and each project component provide their AHRQ user credentials, in the form of a password and username, to access the system.

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

Yes

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

Organization

AHRQ credentials including password and username.

Zip code

sex, age, and race

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

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

100,000-999,999

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

PSS is a GSS that hosts and provides system functionality to support survey data collection for CAHPSs, SOPs, and MEPS-ENCL. The primary purpose of each survey collection is identified below:

CAHPS - - PII is collected about the organization or survey vendor that is submitting data . This information may be used by the CAHPS project to contact the submitting organization.

SOPS- PII is collected to manage the intake of survey data provided by various health organizations, or vendors. The system provides guidelines for submission, manages the intake of survey questionnaires and survey data, and provides access to reports. The survey data itself does not contain PII.

MEPS-ENCL- PII is collected from survey respondents to correlate and combine data received from the Household Component of the MEPS survey. This PII is used to generate statistical data that is used to spot trends in healthcare spending. The PII of medical care providers is used to contact them to request supplemental data about the provision of healthcare identified in the household survey. PII is collected from interviewers providing the household component of the survey to track submission of survey data.

AHRQ employee and direct contractor credential information is collected to provision account access for system development and administration activities.

Data in the Child HCAHPS Database will be used to create three primary types of reports: Hospital Feedback Reports, Child HCAHPS Chartbook, and Online Reporting System. These reports will be utilized to raise awareness, examine trends, and evaluate impacts to patient experience.

**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?**

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.**

MEPS-ENCL: 09-35-0002 (AHRQ Privacy Act System of Records Notice; Medical Expenditure

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

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

As part of PSS, each information collection has a corresponding OMB collection approval as stated in the following:

OMB 0935-0165 Collection of Information for Agency for Healthcare Research and Quality (AHRQ) Consumer Assessment of Healthcare Providers and Systems (CAHPS) Health Plan Survey Comparative Database  
Expiration Date: 12/31/2026;

OMB: 0935-0162 Collection of Information for AHRQ's Hospital Survey on Patient Safety Culture Comparative Database,

Expiration Date 10/31/2025;

OMB: 0935-0196 Medical Office Survey on Patient Safety Culture Comparative Database,  
Expiration Date 09/30/2024;

OMB: 0935-0195 Nursing Home Survey on Patient Safety Culture Comparative Database,  
Expiration Date 10/31/2024;

OMB: 0935-0118 Medical Expenditure Panel Survey Household Component and Medical  
Provider Component (MEPS-HC and MEPS-MPC) Expiration Date 3/31/2027;

OMB 0935-0110 Medical Expenditure Panel Survey - Insurance Component (MEPS-IC)  
Expiration Date 01/31/2026

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

Yes

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

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

The PII shared with other AHRQ Program Offices is limited to the CAHPS/Child HCAHPS, SOPS, and MEPS-ENCL project components for the sole purpose of organizing and categorizing survey data for analytics. PII shared includes contact information of the project manager or the interviewer of the survey. As a result, there is no agreement in place to share this data.

The SOPS databases collect survey data from respondents by various participating organizations (e.g. hospitals, medical offices). Participating organizations sign a data use agreement (DUA) to protect the confidentiality of their data to the public and allows Westat to submit the data to the database(s).

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

Data that includes PII is collected and maintained by AHRQ employees and direct contractors who administer the surveys and compare the data to provide the analysis. These processes are documented within the PSS System Security Plan (SSP). PSS tracks disclosures of PII to individuals and organizations through logs and documentation.

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

CAHPS/Child CAHPS: Participating organizations are notified of the data collection through an AHRQ listserv where they receive a hyperlink to register for the database. During registration, they

are asked to enter contact information (e.g., name, address, phone, email, fax).

SOPS: Participating organizations are notified of the data collection through an AHRQ listserv where they receive a hyperlink to register for the database. During registration, they enter their contact information (e.g., name, address, phone, email, fax).

MEPS-Enclave: Individuals are notified that personal information is collected during an interview and have the right of refusal upon initial contact via letter or phone call and at any time.

For CAHPS/Child CAHPS, SOPS, MEPS-Enclave: users are notified by system administrators that only userIDs and passwords are collected to give 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.**

CAHPS/Child HCAHPS: Contributions to the CAHPS Database by Participating Organizations are voluntary. The CAHPS DUA allows participating organizations to revoke their participation in the database by providing written notification to the CAHPS database(s). The request for revocation will not apply, however, to data that was previously submitted and released prior to receipt of written request to revoke consent.

SOPS: The SOPS DUA contains language that allows database participating organizations revoke their data by sending written notification to the SOPS database(s). However, the request for revocation will not apply to Data already authorized and released prior to receipt of written request to revoke consent.

MEPS-ENCL: Information is gathered through an interview process with the selected participants and is provided on a voluntary basis. Prior to the interview process, it is explained to the participants what data is being collected, why, and how the data is shared and protected. Interviewees are given the option to decline answering any question, and no data containing PII is shared at any time.

AHRQ employees and direct contractors must provide their information in order to provision accounts for system development and administration. There is no option to opt out of 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.**

CAHPS/Child HCAHPS: PII is not collected from individuals who participated in the HP or CG CAHPS surveys. There is no process to obtain consent for participating organizations for major system changes. However, participating organizations are required to submit a signed DUA each time they participate in the CAHPS Database and the DUA explains how any PII is used and safeguarded. No major system changes are anticipated.

SOPS: The only PII we collect is the contact information of participating organizations and their site (s). Participating organizations/sites that want to make changes to their contact information can do so by logging into the system or by contacting our technical assistance help line.

MEPS-ENCL: There is no process to obtain consent for major changes to the system such as data use, as no major changes are anticipated after the initial consent is provided.

AHRQ employees and contractors are notified of the purpose of the collection of user credentials at the time of collection, and these individuals are aware of the requirement to collection this

information to provision system access.

**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.**

CAHPS/Child HCAHPS: Participating organizations provide their contact information in order to submit data to the CAHPS Database. These organizations can update or correct their own contact information through the CAHPS submission system or can contact the CAHPS Database by email or by telephone to have corrections made.

SOPS: The only PII we collect is the contact information of participating organizations and their site (s). If that information is inaccurate, staff will contact the participating organization through their general number to obtain the correct contact information.

MEPS-ENCL: Individuals whose PII is collected are notified of their ability to contact AHRQ and the project manager by email or telephone to correct information that is incorrect, and to discuss the inappropriate use or disclosure of their information.

AHRQ employees and contractors may contact the PSS system owner and the project managers for each of the project components to address concerns if their information is used or disclosed inappropriately. These individuals may also correct inaccurate information with the system owner and the project managers.

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

CAHPS/Child HCAHPS: Participating organizations provide their contact information in order to participate and submit data to the CAHPS Database. No other PII is collected. CAHPS Database staff and managers review this contact information for completeness and accuracy for each data submission cycle (annual).

SOPS: The only PII we collect is the contact information of participating organizations and their site (s). The information is regularly updated during each data submission and reporting periods.

MEPS-ENCL: At every stage of the project the MEPS project management team manages the engagement of conducting surveys to prevent the exposure of confidential information. Each year staff are required to read and sign the AHRQ affidavit that requires confidentiality procedures for the protection of PII. During project operations staff minimize the number of documents on which PII appears, but some documents with identifying information are essential to the operation. Laptops, for example, are used by interviewers to complete the survey with household members. All laptops have full-disk encryption using software that is FIPS 140-2 compliant.

AHRQ employees direct contractors provide credentialing information for system account provisioning. The information used to log into the system must be correct for account access, or corrected to gain access onto the system.

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

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

CAHPS/Child HCAHPS: Contact information for Participating organizations is the only PII collected for CAHPS. Business and functional requirements dictate who may access PII, and access is provided on a 'least privilege' basis such that only contractor staff that need to access to PII receive it.

SOPS: The only PII we collect is the contact information of participating organizations and their site (s). Participating organizations sign a DUA that allows Westat to access their site name and site contact information for submission to the databases.

MEPS-ENCL: Business and functional requirements dictate who may access PII, and access is provided on a 'least privilege' basis such that only AHRQ employees and contractors that need to access to PII receive it.

**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.**

CAHPS/Child HCAHPS: Permissions are limited to staff roles needed to accept data submissions from Participating Organizations, for data analysis, and for reporting.

SOPS: Permissions are limited to particular staff roles needed for data submission, data analysis, and data reporting.

MEPS-ENCL: Permissions are limited through the use of system roles that were identified during the requirements gathering phase of the project. The system roles only allow access to a minimum amount of information for system administrators to adequately perform their job.

**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.**

For PSS all personnel using or supporting the system, including project component managers, must complete the annual HHS Information Systems Security Awareness Training and Privacy Awareness Training.

**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.**

GENERAL RECORDS SCHEDULE 3.1: General Technology Management Records (section 011)

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

The PSS is a GSS that hosts and provides system functionality, including administrative, technical, and physical security controls, for the information that is collected by the hosted CAHPS, SOPS, and MEPS-ENCL surveys. The PSS employs access controls, personnel security awareness and training, regular auditing of information and information management processes, careful monitoring of a properly accredited AHRQ PSS information system, control of changes to the AHRQ PSS, appropriate handling and testing of contingencies and contingency planning, ensuring that all users of the AHRQ PSS are properly identified and authorized for access, and that they are aware of the



rules and acknowledge that fact, by ensuring that any incident is handled expeditiously, properly maintaining the AHRQ PSS and regulating the environment the system operates in, controlling media, evaluating risks and planning for information management and information system operations, by ensuring that the system and any exchange of information is protected, by maintaining the integrity of the AHRQ PSS and the information stored in it, and by adhering to the requirements established in the contracts and statements of work of the hosted projects.

**Identify the publicly-available URL:**

The PSS hosts <https://innovations.ahrq.gov/>, <http://www.ahrq.gov/cahps/index.html>, and <https://sopsdatabase.ahrq.gov> on behalf of the CAHPS, SOPs, and MEPS-ENCL programs.

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.**

**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?**

No