

**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**

<b>Status:</b>	Approved	<b>PIA ID:</b>	1078778
<b>PIA Name:</b>	HRSA - TRIP - QTR1 - 2020 - HRSA580665	<b>Title:</b>	HRSA - HRSA Trainee Information Portal
<b>OpDIV:</b>	HRSA		

**PTA**

<b>PTA - 1A:</b>	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance
<b>PTA - 1B:</b>	Is this a FISMA-Reportable system?	Yes
<b>PTA - 2:</b>	Does the system include a website or online application?	Yes

**URL Details**

Type of URL	List Of URL
Publicly accessible website with log in	grants.hrsa.gov
<b>PTA - 3:</b>	Is the system or electronic collection, agency or contractor operated?
<b>PTA - 3A:</b>	Is the data contained in the system owned by the agency or

	contractor?	
<b>PTA - 5:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
<b>PTA - 5A:</b>	If yes, Date of Authorization	12/3/2018
<b>PTA - 6:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.	New
<b>PTA - 8:</b>	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?	The Children's Hospitals Graduate Medical Education (CHGME) project has been established to provide those institutions receiving Bureau of Health Workforce (BHW) grant funding via the CHGME Grant program with a user-friendly portal where demographic data from individuals can be electronically captured and stored reducing the burden currently placed on the grantee. This portal will save each grantee a significant number of hours a year. It will also improve data quality and increase BHW's ability to share and marry specific data about its programs.
<b>PTA - 9:</b>	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>The system will collect and store information regarding the supported BHW grant programs such as program name, grant number, training programs, and data collection questions related to Individual General data (IND_GEN) forms, etc. This information is already collected and exists in HRSA Electronic Handbooks (EHBs) and will be referenced from and stored in CHGME portal. Along with the grant program information, the system collects demographic information about trainees participating in these programs. The system relies on EHB to authenticate a CHGME user and as such the system does not collect user information to grant access.</p> <p>The system will collect Full Name, Country, State, or City of Residence, age, gender or race, Name of the School Attending or Workplace, Grades, Salary, or Job Position, Email Address, Health Care Research and Practitioner Education, NPI Number (issued to health care providers in the United States by the Centers for Medicare and Medicaid Services), etc. The Information categories of this data are as follows: PII Information, Other Information Linkable to an Individual, Human Resource Management, Higher Education, and Health Care Research and Practitioner Education Information.</p> <p>Electronic Handbooks (EHBs) has it own PIA.</p>
<b>PTA - 9A:</b>	Are user credentials used to access the system?	Yes
<b>PTA - 9B:</b>	Please identify the type of user credentials used to access the svstem.	<p>HHS User Credentials</p> <p>HHS/OpDiv PIV Card</p> <p>Non-HHS User Credentials</p> <p>Email address</p> <p>Password</p>

**PTA - 10:** 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

BHW has undertaken a business transformation effort to reduce this burden on the grant recipient institutions by developing a data collection Portal for grantee institutions. The intent of this Portal is to provide the institutions with a method for collecting demographic data from individuals electronically. The Portal shall contain surveys pre-populated with BHW's demographic questions, allowing institutions to send out the surveys electronically and store and review the survey responses in the Portal. The survey being sent out mirror that of the IND-GEN and IND-GENPY forms that currently exist in EHBs. When the annual reporting period opens up the Portal shall allow the grantee institutions to submit this data in bulk to the EHB platform.

The system will collect and store information regarding the supported BHW grant programs such as program name, grant number, training programs, and data collection questions related to IND\_GEN forms, etc. This information already collected and exists in HRSA EHBs and will be referenced from and stored in CHGME portal. Along with the grant program information, the system collects demographic information about trainees participating in these programs. The trainee information will be collected through responses to the surveys.

The system relies on EHB to authenticate a CHGME user and as such the system does not collect user information to grant access.

The Information categories of this data are as follows: PII Information, Other Information Linkable to an Individual, Human Resource Management, Higher Education, and Health Care Research and Practitioner Education Information.

**PTA - 10A:** Are records in the system retrieved by one or more PII data elements?

Yes

**PTA - 11:** Does the system collect, maintain, use or share PII?

Yes

**PIA**

**PIA - 1:** Indicate the type of PII that the system will collect or maintain

Name

E-Mail Address

Phone numbers

Education Records

Mailing Address

Employment Status

Others - NPI Number; Race; Age; Gender

**PIA - 2:** Indicate the categories of individuals about whom PII is collected, maintained or shared

Public Citizens

**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?

The data is being collected to be bulk uploaded to EHB to populate the IND-GEN forms that HRSA requires of the grantees as part of the yearly reporting process. The data will also be used to reach back out to the trainees for follow-up information once they complete their respective training programs.

<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research)	For trainees who participated in the CHGME grant program, provide future longitudinal analysis around where they end up.
<b>PIA - 7:</b>	Identify legal authorities, governing information use and disclosure specific to the system and program	No. 09-15-0092 "HRSA Trainee Information Portal (TRIP)."
<b>PIA - 8:</b>	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.	No. 09-15-0092 "HRSA Trainee Information Portal (TRIP)." <a href="https://www.federalregister.gov/documents/2018/03/14/2018-05062/privacy-act-of-1974-system-of-records-notice">https://www.federalregister.gov/documents/2018/03/14/2018-05062/privacy-act-of-1974-system-of-records-notice</a>
<b>PIA - 9:</b>	Identify the sources of PII in the system	Directly from an individual about whom the information pertains  Online  Government Sources  Within the OPDIV  Non-Government Sources  Members of the Public  Private Sector
<b>PIA - 9A:</b>	Identify the OMB information collection approval number or explain why it is not applicable.	OMB approval number is 0915-0061.
<b>PIA - 9B:</b>	Identify the OMB information collection expiration date.	6/30/2019
<b>PIA - 10:</b>	Is the PII shared with other organizations outside the system's Operating Division?	No
<b>PIA - 11:</b>	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason	The Trainee's personal information is already being collected as part of their employment application to the grant program by the program coordinator/grantee. If the portal is used to collect information from the trainee, they will be presented with a disclaimer prior to them submitting their personal information. With that said, the Grantee's are already collecting and reporting on this information every year in EHB per the CHGME program requirement, this Portal is being put in place to help automate the existing manual reporting process.
<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or	Voluntary

	mandatory?	
<b>PIA - 13:</b>	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	For the trainee to opt out of providing their information in the portal would mean they simple don't complete the survey that they access through a link that is sent to their email. Although, most of the time the program grantee/coordinator will already have their information and will have the ability to input the trainee's information into the portal manually.
<b>PIA - 14:</b>	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	At this time there is not a process in place to notify the trainees of any major changes that will occur in the portal. The CHGME Portal will be released at a pilot and will not be the system of record. EHB will be considered the system of record.
<b>PIA - 15:</b>	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 no process exists, explain why not	The Trainee will have the ability to reach out to the Grantee for the institution they are reporting on. The Grantee will have the ability to field any specific PII data concerns a Trainee may have.
<b>PIA - 16:</b>	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	If the trainee's information is manually or automatically added to the CHGME Portal by the Grantee/Coordinator, the trainee will have the ability to review and validate if the data entered is correct.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system and the reason why they require access	Users Administrators

<b>17A:</b>	<p>Provide the reason of access for each of the groups identified in PIA -17</p> <p>Users - The Grantee's are the users and individuals who collect and record this data in the Portal.</p> <p>Administrators - A system administrator will need access to the portal to resolve any potential system issues related to functionality, data collection, and/or data migration.</p>
<b>PIA - 18:</b>	<p>Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII</p> <p>Only the Grantees/Coordinators have the ability to access the CHGME Portal. We are leveraging EHB's authentication process so only Grantees/Coordinators that have EHB accounts will be able to access the Portal. The trainees will not have access to the Portal.</p>
<b>PIA - 19:</b>	<p>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</p> <p>The permissions will be set up in the Portal where the Grantees/Coordinators will only be able to create/edit/monitor/access trainee records associated with their specific grant programs.</p>
<b>PIA - 20:</b>	<p>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</p> <p>All internal users are required to complete HRSA annual security awareness training.</p>
<b>PIA - 23:</b>	<p>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)</p> <p>BHW is developing a record retention policy and disposition schedule for Training Information Portal (TRIP) records. Until a disposition schedule has been approved by the National Archives and Records Administration (NARA), the records will be retained indefinitely.</p>

**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

The CHGME data collection portal will be hosted at the HRSA Data Center. The HRSA Data Center supports several key HRSA applications and is compliant with HHS security guidelines. The physical access to the data center is restricted to only authorize personnel from the HRSA Data Center team. So HRSA Data Center physical security controls and processes will protect any PII information stored within CHGME servers. The CHGME technical architecture will ensure PII data is encrypted at rest as well as during transmission from the user machine. All communication will be encrypted using SSL between user machines to the CHGME servers. The CHGME servers will be placed behind the HRSA firewalls and will be further protected using virtual local area network for restricting communication between the servers. The PII data will be encrypted when storing in CHGME database. All these technical measures will ensure PII data is secure and protected. Besides, physical and technical controls PII data will be protected through administrative controls by user roles and permissions. Only authorized roles will have access to PII data and will have policies and procedures to grant them necessary access.

**PIA - 26:** Does the website have a posted privacy notice? Yes

**PIA - 28:** Does the website have any information or pages directed at children under the age of thirteen? No

**PIA - 29:** Does the website contain links to non-federal government websites external to HHS? No