

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

10/31/2016

OPDIV:

OS

Name:

Response Management System

PIA Unique Identifier:

P-7834335-967309

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?

No

Identify the operator.

Agency

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.

PIA Validation

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

None

Describe the purpose of the system.

The Response Management System (RMS) suite is used by the Department of Health Human Services (HHS) National Disaster Medical System (NDMS) as part of its lead role in Emergency Support Function #8 to maintain readiness roster and deploy Federal Responders on NDMS teams (e.g., Disaster Medical Assistance Teams/DMAT) to provide emergency support and Medical Assistance for Presidentially Declared Disasters, National Security Events or other Public Health Emergencies or disasters. The RMS suite is the Assistant Secretary for Preparedness and Response's (ASPR's) source of current information for the 7000 Federal Emergency Service Function 8 (ESF-8) responders located all over the country. RMS also provides existing spending plan creation capability along with commitment and obligation tracking of funds against spending plan line items.

Underlying the RMS interdependent application is an organizational and human resource management system that stores information for the NDMS Teams, its relationship to other Operating Divisions within the ASPR hierarchy, and the individuals (Federal employees) within each of those organizational units.

The Response Management System (RMS) suite consists of three interdependent (not child) applications used by ASPR to manage organizations' preparations for, and responses to, disasters. The three interdependent applications are called Personnel Accountability Reporting System (PARS), Response Management System (RMS), and responder e-learner (REL). All three interdependent applications reside within the RMS suite. Underlying the RMS interdependent application is an organizational and human resource management system that stores information for the NDMS Teams, its relationship to other Operating Divisions within the ASPR hierarchy, and the individuals (Federal employees) within each of those organizational units. Within the interdependent application, RMS, there are five functional areas, also known as tabs.

The Responder tab is used by ESF-8 deployment team leadership to maintain the contact and deployable criteria for all of the 7000 ESF-8 responders. The Event tab is used to log the various actions that are taken in preparation or response to a disaster or National Special Security Event (NSSE). The Deployment tab in RMS is used by approved ASPR personnel to create deployment rosters for the ESF-8 medical response teams. The Training tab in RMS is used by Office of Emergency Management (OEM) to track Incident Response Coordination Team (IRCT) classes facilitated by Training, Exercises and Lessons Learned (TELL). The Admin tab is where RMS users can manage their account and preferences.

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

The RMS suite captures data pertaining to "Emergency Service Function 8" (ESF-8), a designation that refers to public health disasters. It contains human resources (HR) data, tracks information pertaining to incidents, and is used to assemble and update medical team rosters and deployments. RMS is used by ESF-8 deployment team leadership to maintain the contact and deployable criteria for all ESF-8 responders. During events is used to log the various actions that are taken in preparation or response to a disaster or National Special Security Event (NSSE). During deployments RMS is used by approved ASPR personnel to create deployment rosters for the ESF-8 medical response teams and the Training data maintained in RMS is used by Office of Emergency Management (OEM) to track Incident Response Coordination Team (IRCT) classes facilitated by Training, Exercises and Lessons Learned (TELL).

The RMS interdependent application information includes federal employees and intermittent federal employees staff and their past and current credentials, training, contact information, and other information relevant to coordinating and deploying resources in the event of a disaster. There is PII including contact information (e. g., email, phone number), used for user authentication and verification.

The information contained in the RMS suite is collected directly from the full time, intermittent HHS employees and non-direct contractors. HHS "Responders" are full time and intermittent HHS employees hired to specifically support the HHS lead role in ESF-8 in public health emergencies, Presidentially declared disasters and National security events must supply periodic updates related to the clinical credentials and training to be maintained as a intermittent federal employee and be eligible for deployment.

The types of information maintained in RMS suite includes; name DOB, SSN, home address, phone number, Clinical Provider Licenses, current training, education, certification, driver license, deployment and employment status, passport, role specific training, photographic identifiers, financial acct information, immunizations, Clinical Provider Credentials (e.g., Medical & Nursing Licenses) Emergency Points of Contact and work capacity (Fiscal Fitness).

The information (PII) maintained in the system is not shared outside OS by this system. Non PII includes training records for job or position related training and course completion (e.g., FEMA ICS courses 100, 200, 700 & 800). As with PII this information is not shared with other systems. RMS maintains user credentials (user ID and password) for system administrators and system users.

PARS uses the following data elements; first and last name, team & organizational affiliation, deployment and employment status, phone number, email address.

REL uses the following data elements; first and last name, team & organizational affiliation, phone number, email address.

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

Information contained in the RMS suite includes information on permanent federal employees and intermittent federal employee's staff and their past and current credentials, training, contact information, and other information relevant to coordinating and deploying resources in the event of a disaster. There is PII including contact information (e. g., email, phone number), used for user authentication and verification.

Specifically, the type of information maintained in the RMS suite includes: name, DOB, SSN, home address, phone number, Clinical Provider Licenses, current training, education, certification, driver license, deployment and employment status, passport, role specific training, photographic identifiers, financial acct information, immunizations, Clinical Provider Credentials (e.g., Medical & Nursing Licenses) Emergency Points of Contact and work capacity (Fiscal Fitness) and user credentials for system administrators and users. Non PII includes training records for job or position related training and course completion (e.g., FEMA ICS courses 100, 200, 700 & 800).

The sections below describe each tab within the RMS interdependent application: Responder tab is used by ESF-8 deployment team leadership to maintain the contact and deployable criteria for all of the 7000 ESF-8 responders. The Event tab is used to log the various actions that are taken in preparation or response to a disaster or National Special Security Event (NSSE). The Deployment tab in RMS is used by approved ASPR personnel to create deployment rosters for the ESF-8 medical response teams. The Training tab in RMS is used by Office of Emergency Management (OEM) to track Incident Response Coordination Team (IRCT) classes facilitated by Training, Exercises and Lessons Learned (TELL).

Additionally, it tracks employee curricula and completed courses within those curricula. The Admin tab is where RMS users can manage their account and preferences. Users can use this application to change their password, indicate how many records they want to view on a page, and setup a forwarding rule for requests assigned to them if they are going to be out of the office. This tab contains issue tracking functionality where they can create and track issues for their organization. They can also use this tab to submit feature requests for RMS.

PARS uses the following data elements; first and last name, team & organizational affiliation, deployment and employment status, phone number, email address.

REL uses the following data elements; first and last name, team & organizational affiliation, phone number, email address.

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
Photographic Identifiers
Driver's License Number
E-Mail Address
Mailing Address
Phone Numbers
Financial Accounts Info
Certificates
Education Records
Military Status
Employment Status
Passport Number
Clinical Provider Credentials (i.e., Licenses)
Emergency Points of Contact
Immunizations & Work Capacity
Current training, deployment status and role specific training
User Credentials (user ID and password)

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

Employees

Vendor/Suppliers/Contractors

Only non-direct Contractors supporting OEM & ASPR, no Vendors or Suppliers. The PII maintained in the system is not shared outside of the federal government.

How many individuals' PII is in the system?

5,000-9,999

For what primary purpose is the PII used?

Demographic, skill and credential information are maintained for the purpose of maintaining employee readiness for deployment and rostering of those personnel to serve on federal medical response teams in support of HHS's ESF-8 function under the National Response Plan. In the event of a disaster, this information is used to create team lists deployed to address needs related to State and local request for support (Medical treatment support or patient movement) during disasters and public health emergencies. PII will be used only within ASPR and the OEM. PII includes intermittent NDMS employees (i.e., employees that are not full time, but vetted and hired, and deployed in the event of disasters). The information (PII) maintained in the system is not shared outside of the federal government.

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

Not Applicable

Describe the function of the SSN.

SSN is used to reliably identify individual record subjects and to distinguish between individuals who have the same or similar names, and is needed to obtain records from and provide data to other systems (primarily other personnel systems, Capital HR/CAP-HR or HHS University for the purposes of documenting completion Mandatory Trainings) that use SSN instead of an alternative identifier.

SSN is contained in the system for certain personnel and other records scanned or entered into this system from other systems, so is unavoidable to include in this system, and may be needed to obtain additional information about those individuals from those same source systems in the future. Intermittent responders employees (Special Government Employees (SGE) employed by NDMS are only deployed on average once every two (2) years have not been issued Personal Identity Verification (PIV) cards, and for whom there is no reliable alternative identifier. The PII maintained in the system is not shared outside of the federal government.

Cite the legal authority to use the SSN.

E.O. 9397 as amended by E.O. 13478 (stating SSN “may” be used), read together with The Office of Management and Budget (OMB) M-07-16 Attachment 1 (allowing SSN to be used when “necessary”). Office of Personnel Management (OPM)/GOVT-1 “General Personnel Records” [civilian OPF records];

OPM/GOVT-5 “Recruiting, Examining, and Placement Records” [civilians];

OPM/GOVT-10 “Employee Medical File System Records” [civilian];

09-90-0018 “Personnel Records in Operating Offices” [civilian catch-all]

09-40-0001 “PHS Commissioned Corps General Personnel Records” [comm’d corps catch-all]; 09-

40-0002 “PHS Commissioned Corps Medical Records” [comm’d corps]

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

National Disaster Medical System (NDMS) Statute, 42 U.S.C. 300hh-11; Title VI of the Civil Rights Act of 1964; and Section 504 of the Rehabilitation Act of 1973. Records disposition of this medical SOR is determined under laws governing federal records through the National Archives, 44 U.S.C.

3303a.42 U.S.C. 300hh-11 creates the National Disaster Medical System. The RMS is authorized by Paragraph (B) of 300hh-11, which states that “The National Disaster Medical System shall carry out such ongoing activities as may be necessary to prepare for the provision of services described in subparagraph (A) in the event that the Secretary activates the National Disaster Medical System for such purposes.”; O. E. 9397 as amended by E.O. 13478 (stating SSN “may” be used), read together with OMB M-07-16 Attachment 1 (allowing SSN to be used when “necessary”). OPM/GOVT-1 “General Personnel Records” [civilian OPF records]; OPM/GOVT-5 “Recruiting, Examining, and Placement Records” [civilians]; OPM/GOVT-10 “Employee Medical File System Records” [civilian]; 09-90-0018 “Personnel Records in Operating Offices” [civilian catch-all] 09-40-0001 “PHS Commissioned Corps General Personnel Records” [comm’d corps catch-all]; 09-40-0002 “PHS Commissioned Corps Medical Records” [comm’d corps]

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.

OPM/GOVT-10 Empl Med File System Records

OPM/GOVT-5 Rec, Exam & Placement Rcd

OPM/GOVT-1 General Personnel Records

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Email

Online

Government Sources

Within OpDiv

Other HHS OpDiv

Non-Governmental Sources

Private Sector

Identify the OMB information collection approval number and expiration date

Not Applicable: RMS is a system that supported the efforts of the NDMS. NDMS operates pursuant to 42 U.S.C 300hh-11, and it resides in the HHS ASPR. The NDMS functions under a coordinated effort between HHS, the DHS, DoD, and VA working in collaboration with the states and other appropriate public or private entities. NDMS employees are activated by the Secretary of HHS to provide health services, health-related social services, or other appropriate auxiliary services to respond to the needs of victims of a public health emergency or other cause for activation as described in 42 U.S.C. 300hh-11 (a)(3). I OMB section 3507 of the paper work reduction Act does not apply.

Is the PII shared with other organizations?

No

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

Individuals are aware of information collection because it is collected directly from federal employees following the application, hiring and on-boarding process.

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.

Major changes to the system would be reflected in updates to the OPM SORN 1, 5 & 10. If necessary, changes would also be communicated through channels associated with employment, such as employee web sites, listservs, memos to supervisors, and newsletters. Individuals are made aware of how their information will be used for the purposes of departmental and maintain their personal readiness as a employee to deploy as part of their assigned team during the on boarding process. As part of being trained on standard operating procedures, individuals will be aware of why and how their PII is used within ASPR and during events or disasters they are deployed to provide medical support. All individuals are given the opportunity to opt-in to the collection hence no need to provide an opt-out.

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

All NDMS medical response personnel (Federal Employees) are organized into teams whose command personnel (Federal employees) enter and maintain and update data within RMS. Individuals' information must be used for them to be available to execute the duties for which they were hired. Changes to the records in RMS are initiated by the team members themselves via the team Administrative Officer or ASPR Human Resources Team members are notified via email of the changes after the changes occur. If the user PII were to be not used for purposes intended or materially different than what they have given consent for, users would be notified directly and through their Team Leadership supervisors if the information in the system were to be used for reason other than the original purposes.

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 believes their data has been misused or is otherwise inaccurate, they may speak to their team leader, who could escalate the complaint as necessary through NDMS leadership.

NDMS also maintains a help desk, through which individuals can submit any concern about the program, including inaccuracy or misuse of information.

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

Data is updated and managed in real-time by NDMS human resource personnel and response team administrative officers. A monthly upload updates rosters to reflect new hires, and other administrative staff verify the accuracy of credentials and update training information. Records are subject to several layers of review, including by officers of the NDMS.

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

Users:

Maintain demographic data.

Administrators:

Maintain demographic data; Deploy medical response personnel.

Developers:

Development and testing of the system.

Contractors:

Development and testing of the system.

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

System owners approve ordinary access (i.e., access permitting the routine uses of the data) based on role. System owners have the ability to grant requests for higher-level administrative access, but the system owner will approve this level of access based on the requester's role within the organization, i.e., if the requester has a legitimate business need to access responder records.

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 uses role-based security. Roles of users are specifically defined, and the system will grant appropriate levels of access as required by the role or job to be performed.

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 receive initial user training and job action training. There are also HHS mandatory annual courses for all staff on 'information systems security awareness' (ISSA), 'Privacy Information Awareness' (PIA) and 'Records Management' courses.

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

There is some additional Role Based Administrative Officer training and RMS user training.

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 Schedule Number: DAA-0468-2014-0001, In accordance with the Records schedule all records from this system will be maintained for 75 years.

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

Administrative: RMS utilizes role-based security and the RMS administrators adhere to a least privilege methodology to ensure that all access rights are approved and are specific to the individual's job role. All user accounts are verified and approved 1:1.

Technical: All users are required to use password of moderate strength upper case lower case number special character and 8 characters in length. Previous password cannot be reused.

Physical: All servers are maintained in secure buildings with authorized access control for authorized users only.

Note: web address is a hyperlink.