

**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>	1455999
<b>PIA Name:</b>	HRSA - UIP - QTR2 - 2022 - HRSA818	<b>Title:</b>	HRSA - HRSA COVID-19 Uninsured Program
<b>OpDIV:</b>	HRSA		

**PTA**

<b>PTA - 1A:</b>	Identify the Enterprise Performance Lifecycle Phase of the system	Development
<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	<a href="https://coviduninsuredclaim.linkhealth.com/">https://coviduninsuredclaim.linkhealth.com/</a>	
<b>PTA - 3:</b>	Is the system or electronic collection, agency or contractor operated?	Contractor
<b>PTA - 3A:</b>	Is the data contained in the system owned by the agency or contractor?	Agency and Contractor
<b>PTA - 5:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	No

<b>PTA - 5B:</b>	If no, Planned Date of ATO	7/1/2022
<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 Uninsured Program (UIP) program was designed to process and distribute claims reimbursement, provide customer service education and outreach, project and program management, compliance and dispute resolution support, provider outreach, and data support for the COVID-19 Claims Reimbursement to Health Care Providers for providing testing, treatment, and vaccine administration for uninsured patients.
<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.	Information (including Personally Identifiable Information (PII)) collected by this system includes: Contact Person Name Contact Person Phone Number Contact Person Email Provider Tax Identification Number (TIN) Provider Name Provider Address
<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 system.	Non-HHS User Credentials  Email address  Password  Username
<b>PTA - 10:</b>	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	The purpose of collecting the above information is to register and determine the eligibility of providers who wish to submit claims for reimbursement related to COVID-19 testing, treatment, and vaccine administration for uninsured patients.
<b>PTA - 10A:</b>	Are records in the system retrieved by one or more PII data elements?	Yes
<b>PTA - 10B:</b>	Please specify which PII data elements are used.	Contact Person Name Contact Person Phone Number Contact Person Email Provider Tax Identification Number (TIN) Provider Name Provider Address
<b>PTA - 11:</b>	Does the system collect, maintain, use or share PII?	Yes

**PIA**

<b>PIA - 1:</b>	Indicate the type of PII that the system will collect or maintain	Name
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		E-Mail Address
		Phone numbers
		Medical records (PHI)
		Taxpayer ID
		Date of Birth
		Medical Records Number
		Patient ID Number
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared	Patients Other
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system	Above 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	To process and distribute claims reimbursement, provide customer service education and outreach, project and program management, compliance and dispute resolution support, provider outreach, and data support for the COVID-19 Claims Reimbursement to Health Care Providers for providing testing, treatment, and vaccine administration for uninsured patients.
<b>PIA - 6:</b>	Describe the function of the SSN/Taxpayer ID.	Taxpayer ID is used to determine the eligibility of Health Care providers for billing and re-imbursement.
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN	31 U.S.C. 3512, 3711, 3716, 3721, 1321 note; E.O. 13520.
<b>PIA - 7:</b>	Identify legal authorities, governing information use and disclosure specific to the system and program	31 U.S.C. 3512, 3711, 3716, 3721, 1321 note; E.O. 13520.
<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.	09-15-0093, Provider Support Records <a href="https://www.federalregister.gov/documents/2021/11/26/2021-25760/privacy-act-of-1974-system-of-records">https://www.federalregister.gov/documents/2021/11/26/2021-25760/privacy-act-of-1974-system-of-records</a>
<b>PIA - 9:</b>	Identify the sources of PII in the system	Directly from an individual about whom the information pertains  Online  Non-Government Sources  Private Sector
<b>PIA - 9A:</b>	Identify the OMB information collection approval number or explain why it is not applicable.	OMB Number (0906-0069)
<b>PIA - 9B:</b>	Identify the OMB information collection expiration date.	2/28/2025
<b>PIA - 10:</b>	Is the PII shared with other organizations	No

	outside the system's Operating Division?	
<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	Through the programs privacy policy, Providers are informed of PII information collected. It is stated "You do not have to provide us with personal information if you do not want to; however, that may limit your ability to use certain functions of this website or to request certain services or information."  <a href="https://coviduninsuredclaim.linkhealth.com/registration/#/privacy-policy">https://coviduninsuredclaim.linkhealth.com/registration/#/privacy-policy</a>
<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
<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	Providers have an option to opt out of providing PII information but doing so could limit their ability to participate in the program and get re-imburement from Uninsured Program.
<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	In case of changes in the permitted disclosures or use, the corresponding Privacy Act Statement, Privacy Act System of Records Notice, and/or website Privacy Policy would be updated. Those updates would put individuals on notice of the additional uses and disclosures, but no additional consent would be captured.
<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 Provider Relief Fund (PRF) System of Records Notice contains a contact for questions about the Privacy Act system and that contact would route concerns to the appropriate PRF officials. The website Privacy Policies contain customer service numbers that individuals may call to make a complaint and the contractor has internal processes to route that to their Privacy Office for triage, remediation, and response.
<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	To ensure integrity of data, the contractor conducts periodic vulnerability and penetration test scans and data is encrypted at rest and in transit. To ensure availability of data, the contractor has disaster recovery processes, backups of data, and does load testing. Accuracy of data is checked throughout the process. There are data validations done on incoming data from HHS and reconciliations of TINs and amounts paid are done during and after funds are disbursed.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system and the reason why they require access	Contractors
<b>PIA - 17A:</b>	Provide the reason of access for each of the groups identified in PIA -17  To help with claim processing and system maintenance.	

<b>PIA - 17B:</b>	Select the type of contractor	HHS/OpDiv Direct Contractor
<b>PIA - 18:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	Contractor privileges are formally authorized and controlled, allocated to users on a need -to-use and event-by-event basis for their functional role (e.g., user or administrator), and documented for each system product/element. Provisioning is managed through enterprise managed solution (i.e. Secure) and requires a multi-level approval process, which is captured within the provisioning system. Access within applications is managed through roles which are commensurate with PII and PHI.
<b>PIA - 19:</b>	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	User provisioning is managed through enterprise managed solution (i.e. Secure) and requires a multi-level approval process, which is captured within the provisioning system. Access within applications is managed through roles to ensure users can get only the minimum access required to perform their job.
<b>PIA - 20:</b>	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 contractor employees and subcontractors must complete a computer-based training course on privacy and security requirements within 30 days of hire and an annual refresher course thereafter.
<b>PIA - 21:</b>	Describe training system users receive (above and beyond general security and privacy awareness training).	In customer or provider-facing business processes, additional training is provided prior to direct engagements with customers or providers.
<b>PIA - 23:</b>	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)	Procedures for Record retention and destruction are documented in the PRF SORN. <a href="https://www.federalregister.gov/documents/2021/11/26/2021-25760/privacy-act-of-1974-system-of-records">https://www.federalregister.gov/documents/2021/11/26/2021-25760/privacy-act-of-1974-system-of-records</a>
<b>PIA - 24:</b>	Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response	Procedures to secure the system using administrative, technical, and physical controls can located in the PRF SORN as well as the Uninsured Program System Security Plan. <a href="https://www.federalregister.gov/documents/2021/11/26/2021-25760/privacy-act-of-1974-system-of-records">https://www.federalregister.gov/documents/2021/11/26/2021-25760/privacy-act-of-1974-system-of-records</a>
<b>PIA - 25:</b>	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	The website is used by providers to submit claims for re-imbursement by the Uninsured Program. This site is available to the public and can be access through the following URL: <a href="https://coviduninsuredclaim.linkhealth.com/">https://coviduninsuredclaim.linkhealth.com/</a>
<b>PIA - 26:</b>	Does the website have a posted privacy notice?	Yes
<b>PIA - 27:</b>	Does the website use web measurement and customization technology?	Yes

**PIA - 27A:** Select the type of website measurement and customization technologies is in use and if it is used to collect PII

Web bug/ beacons - Collects PII

Session Cookies - Collect PII

Persistent Cookies - Collect PII

**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?

Yes

**PIA - 29A:** Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?

Yes

**PIA - 29B:** Is a TPWA needed for this system?

No