

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

02/16/2017

OPDIV:

CMS

Name:

Children's Health Insurance Program Statistical Enrollment Data System

PIA Unique Identifier:

P-7307016-919116

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.

Contractor

Is this a new or existing system?

Existing

Does the system have Security Authorization (SA)?

Yes

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

None

Describe the purpose of the system.

The Children's Health Insurance Program (CHIP) was mandated by the Balanced Budget Act of 1997. The Children's Health Insurance Program Statistical Enrollment Data System (CHIP SEDS) is a system that states use to submit enrollment data for the Medicaid and Children's Health Insurance Program to CMS. This is statistical enrollment data used to support reporting to the Congress and the public. It is aggregate data only, does not contain any information pertaining to individual enrollees.

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

All states with Title XXI programs and children covered by Medicaid collect program enrollment statistics and report them to CMS via the SEDS. States submit forms based on the Title XXI programs in which they participate and for the number of children covered by Medicaid. These forms are contained within the SEDS and are completed and submitted online.

The information collected by the SEDS is the number of people participating in the various Title XXI programs in which the state participates and the number of children covered by Medicaid, divided into categories. This data is aggregate data only and does not contain any identifiable information about individual enrollees.

In order to manage access privileges to the SEDS, the following user information is in the SEDS: User ID, assigned by CMS when the user requests access to the SEDS, user name provided when requesting access to the SEDS, email address and a password.

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

Statistical enrollment data about the Medicaid and CHIP programs is collected from states, on a quarterly and annual basis, and is used for analysis of the programs and for reporting to Congress and the public. This information is aggregate data only and does not contain any information pertaining to individual enrollees.

In order to manage access privileges to the SEDS, the following user information is collected and maintained by the SEDS: user ID, name and email address. The user information is maintained for as long as necessary for the user to access the system. The system users are CMS employees, CMS/HHS direct contractors and designated state employees.

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

Yes

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

Name

E-Mail Address

Other: User ID, password

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

Employees

Business Partner/Contacts (Federal/state/local agencies)

No

How many individuals' PII is in the system?

100-499

For what primary purpose is the PII used?

The PII is required to create a user account within CHIPS/SEDS, which allows the user to access the application.

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

None

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

Title XXI of the Social Security Act and
5 USC 301, Departmental regulations

Are records on the system retrieved by one or more PII data elements?

No

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Online

Government Sources

Within OpDiv

State/Local/Tribal

Identify the OMB information collection approval number and expiration date

0938-0841 Expires 9/30/2021

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.

As part of the process to obtain access to CMS computer systems, individuals are notified on CMS form 20037 that their personal information is being collected.

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.

Individuals are required to submit their PII to access the system and perform actions. Therefore, there isn't a method for an individual to opt-out, since their PII is required to utilize the system.

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

If there was a major change to the CHIP SEDS system that affected the user credentials (PII), the users would be notified by normal CMS channels: email and the warning banner on the system logon.

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.

After logging into the system, the home page of the system has CMS IT contact information. Individuals are able to contact CMS with concerns regarding their privacy

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

A CHIP SEDS administrator or Business Owner (BO) representative reviews all user accounts for accuracy and relevancy, to determine if the user still needs access and that the information is correct. Users maintain their information which also assists with accuracy and relevancy. The system maintains the data integrity and availability by employing security technologies including firewalls, and encryption and system access logs.

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

Administrators:

Administrators may access PII in order to perform functions related to maintenance of user accounts.

Developers:

Developers in performing functions related to the system's technology architecture may access PII.

Contractors:

Contractors, in their role as an administrator or developer, may have access to PII in connection with the function of those roles.

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

CHIP SEDS uses role-based access principles to determine and control access to PII. The system roles are segmented by types of actions that a user can perform and information that is accessible.

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.

CHIP SEDS uses the principle of least privilege when assigning roles and job functions to system users. This limits the amount of data accessible to a specific user and eliminates the ability to access full system information, including levels of access to PII.

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 CMS employees and direct contractors are required to take an annual Security and Privacy Awareness Training to access any CMS system. The training is confirmed by a test at the end and the system verifies the completion of the course.

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

None

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.

CHIP SEDS follows the National Archives and Records Administration (NARA) General Records Schedule 3.2 which has several provisions for record retention. The time periods vary from temporary retention to up to 20 years 6 months, depending on the type of user credentials (the PII in the system) and need to retain.

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

The administrative controls in place to secure the PII include role-based access and permissions, periodic review of users and deletion of non-active accounts.

The technical controls in place are firewalls that prevent unauthorized access, encrypted access at log on, security scans, penetration testing, and intrusion detection and prevention systems (IDS/IPS) and computer system controls that prevent users without administrative or developer access to log into a test environment and the test environment and usable application are not joined together.

The physical controls in place are as follows: the use of identification security cards and pass codes, Closed Circuit TV (CCTV), and 24x7 security guards.