## Privacy Impact Assessment (PIA): HRSA - IKN - QTR4 - 2021 - HRSA777651

Signed Date: 3/7/2022

## 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**

PIA ID: 1416521

Title:

PIA Name: HRSA - IKN - QTR4 -

2021 - HRSA777651

HRSA - HRSA Data Warehouse

HRSA OpDiv:

# **Legacy PIA**

ID:

# **PTA**

PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance
PTA - 1B:	Is this a FISMA-Reportable system?	No
PTA - 2:	Does the system include a website or online application?	Yes
PTA - 2A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	
URI Deta	ils	

Type of URL	List Of URL
Other	https://opanet.hrsa.gov/opa
Internet (publicly available)	insurekidsnow.gov
Internet (publicly available)	https://insurekidsnow.gov
Internet (publicly available)	https://ikndata.insurekidsnow.gov/WebExternal/Login.aspx

PTA - 3:	Is the system or electronic collection, agency or contractor operated?	Agency
PTA - 3A:	Is the data contained in the system owned by the agency or contractor?	Agency
PTA - 5:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
PTA - 5A:	If yes, Date of Authorization	12/15/2021
PTA - 5B:	If no, Planned Date of ATO	
PTA - 8:	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 purpose of the IKN system is to collect dental provider data from states and their authorized representatives and publish it through a publicly available website so families can find a dentist for their children who accepts health plans managed under Medicaid and Children Health Insurance Program (CHIP).
PTA - 9:	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.	The system collects and maintains two types of information: 1) dental provider and health program details intended to be published in a publicly available site. The individual fields collected for publication are outlined in the IKN Technical Guidance document available at: <a href="https://ikndata.insurekidsnow.gov/WebExternal/files/Insure%20Kids%20Now%20Technical%20Guidance.docx">https://ikndata.insurekidsnow.gov/WebExternal/files/Insure%20Kids%20Now%20Technical%20Guidance.docx</a> . It includes information such as the name of the health insurance program, the name of dental providers, group practices, and/or facilities, the

address where services are provided, and the phone number where a member of the public could call to make an appointment with the listed provider. The data published in the IKN dental provider locator tool does not contain any PII. 2) The second category of information is information collected from state administrative users (users who work directly for a state government and their representative (contractor organizations authorized by the state to upload data on their behalf) that is needed to administer the website used to collect the provider data. This includes the name, work email address, work phone number, and work mailing address of the state administrative user or contractor. This information is collected so that the federal agency representatives (CMS & HRSA) and the system administrators have access to contact information for system users to advise them of upcoming system changes, to distribute communications regarding webinars or materials of interest to them, and to provide technical assistance to the individuals using the system. The data needed to administer the website that is used to collect the provider data is not accessible to anyone besides system administrators.

Information provided by public citizens accessing the publicly available dental locator tool are provided as search criteria used to filter the results to give them information most relevant to their needs. Search criteria may include the following: requests to filter the data by location (address, ZIP code, city name, state name), name of a health insurance plan, whether a provider accepts new patients, provider specialty, and languages spoken by the provider.

PTA -9A: Are user credentials used to access the system?

PTA - 9B: Please identify the type of user credentials used to access the

system.

Yes

Non-HHS User Credentials

Password

### Username

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

The Ensure Kids Now system has two primary components: the publicly available locator tool and the IKN Data Management website. State administrative users and their authorized representatives use the IKN Data Management website to upload files containing dental provider details and to edit health plan information. That information is then published through the Ensure Kids Now public website so

		families can use the IKN locator tool to find dentists for their children.
PTA - 10A:	Are records in the system	No
	retrieved by one or more PII data elements?	
PTA - 10B:	Please specify which PII data elements are used.	
PTA - 11:	Does the system collect, maintain, use, or share PII?	No
PIA		
PIA - 1:	Indicate the type of PII that the system will collect or maintain Indicate the categories of	
PIA - 2:	individuals about whom PII is collected, maintained, or shared	
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system	
PIA - 4:	For what primary purpose is the PII used?	IKN does not process PII
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g., testing, training, or research)	IKN does not process PII
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	IKN does not process PII
PIA - 8:	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.	IKN does not process PII
PIA - 9:	Identify the sources of PII in the system	
PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	
PIA - 9B:	Identify the OMB information collection expiration date.	
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	
PIA - 11:	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason	IKN does not process PII
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 13:	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	IKN does not process PII

	reason	
PIA - 14:	reason  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  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	IKN does not process PII  IKN does not process PII
	is inaccurate. If no process exists,	
PIA - 16:	explain why not  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	IKN does not process PII
PIA - 17:	Identify who will have access to	
	the PII in the system and the	
PIA - 18:	reason why they require access  Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	IKN does not process PII
PIA - 19:	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	IKN does not process PII
PIA - 20:	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	IKN does not process PII
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	IKN does not process PII
PIA - 23:	Describe the process and guidelines in place about the retention and destruction of PII. Cite specific NARA records retention schedule(s) and include the retention period(s)	IKN does not process PII
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	IKN does not process PII
PIA - 25:	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.).	The purpose of the IKN system is to collect dental provider data from states and their authorized representatives and publish it through a publicly available website so families can find a dentist for their children who accepts health plans managed

	your response	under Medicaid and Children Health Insurance Program (CHIP).  https://www.insurekidsnow.gov/find-a-dentist/index.html
PIA - 26:	Does the website have a posted privacy notice?	Yes
PIA - 27:	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	Persistent Cookies - Does Not Collect PII
PIA - 28:	Does the website have any information or pages directed at children under the age of thirteen?	No
PIA - 28B:	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PIA - 29:	Does the website contain links to non-federal government websites external to HHS?	No