

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

01/14/2026

**OPDIV:**

IHS

**Name:**

Joslin Vision Network (JVN) Teleophthalmology IHS wide

**PIA Unique Identifier:**

P-3016272-984354

**The subject of this PIA is which of the following?**

General Support System (GSS)

null

**Is this a FISMA-Reportable system?**

No

**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?**

New

**Does the system have Security Authorization (SA)?**

No

**Indicate the following reason(s) for updating this PIA.****Describe the purpose of the system.**

The Joslin Vision Network (JVN) is a tele-ophthalmology program originally developed by Joslin Diabetes Center, used by Indian Health Service (IHS) as the IHS-JVN Teleophthalmology Program to screen for and manage diabetic eye disease in people with diabetes. Its main purpose is to detect diabetic retinopathy (DR) and other retina diseases early — before patients notice vision loss — so treatment can prevent blindness.

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

The system will collect and maintain the following PII elements:

Patient information such as name, date of birth, medical notes/medical record number, and retinal images to enable the diagnosis of diabetic retinopathy.

The system will be accessed using username and password.

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

This is an ongoing system that collects and transmits patient information such as name, date of birth, medical record number, medical notes and retinal images to support the diagnosis of the level of diabetic retinopathy. Data is stored for diagnostic purposes and future reference during subsequent imaging. All information is stored on the PHX AREA server. Data is never stored at a contractor site or any site outside the IHS system.

The system is accessed via username and password.

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

Yes

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

Date of Birth

Name

Biometric Identifiers

Medical Records Number

Medical Notes

User credentials, username and password will be collected.

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

Patients

**How many individuals' PII is in the system?**

100,000-999,999

**For what primary purpose is the PII used?**

To support and assist in the diagnosis of diabetic retinopathy.

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

N/A

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

N/A

**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.**

Medical, Health, and Billing Records Systems 09-17-0001

**Identify the sources of PII in the system.**

Directly from an individual about whom the information pertains

In-Person

Government Sources

**Identify the OMB information collection approval number and expiration date**

N/A

State/Local/Tribal

**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.**

Patients provide information to their health clinic staff and this information is entered into the JVN software, transmitted to the IHS server.

**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.**

Patient can decline but the study cannot be done without this information. In this circumstance, the patient would be referred for a dilated retinal examination in the eye clinic instead of being imaged.

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

Need for consent is determined by each site's clinic processes and policies and not by the IHS-JVN program. Each site is performing the imaging studies and this would be similar to obtaining x-rays, which does not require consent. If a breach isolated to our system were to occur, we would notify the appropriate IT staff and administrators in the IHS. The IHS-JVN program is a closed system that does not use the cloud.

**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.**

The patient may file their concerns or complaints with a patient advocate or the organization's privacy officer.

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

The Indian Health Service oversees these processes and the IHS JVN program abides with requests for information. All employees and contractors complete recommended and required training.

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

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

IHS background security and additional security for PIV cards controls access. Access is role based.

**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.**

IHS PIV access is regulated and controlled. The only PII entered at the time of imaging is the minimum required to complete the task. Access is role based.

**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 staff and contractors complete the required Information Systems Security Awareness training and any additional assigned training.

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

IHS Information Systems Security Awareness and the HHS course titled "Privacy Awareness"

**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 Retention Schedule Number DAA-0513-2014-0003, sequence 0003, titled "Health Records File. Electronic Health Record." cites the Retention Period as follows: "Destroy/delete 75 years after last episode of patient care or date of death."

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

Administrative controls include access request and approval procedures for administrative level users only. Technical controls include username/password complexity requirements, password expiration rules, and active use checks. Physical controls (for physical servers) are in place with the Phoenix Area IT department providing access to only authorized individuals.