

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

04/21/2026

OPDIV:

IHS

Name:

Pharmacy Refill Platform

PIA Unique Identifier:

P-4127929-439718

The subject of this PIA is which of the following?

General Support System (GSS)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

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 Pharmacy Refill Application supports IHS pharmacy operations by allowing patients to request prescription refills and enabling pharmacy staff to manage those requests efficiently and safely. The system collects basic patient information to confirm identity, retrieves the correct prescription from the patient's health record, verifies refill eligibility, and transmits the request to the pharmacy for processing. It also supports communication functions by notifying patients when medications are ready for pickup or delivery. Overall, the system helps ensure timely access to medications, improves workflow efficiency for pharmacy staff, and supports continuity of care for patients.

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

The Pharmacy Refill application used within the Indian Health Service (IHS) is a tool that helps patients request prescription refills and helps pharmacy staff process those requests quickly, safely, and accurately. It supports routine pharmacy operations by making sure the correct medication is linked to the correct patient and that patients are notified when their prescriptions are ready. For patients, the system collects and maintains basic identifying information (PII) such as full name, date

of birth, medical record number, address, phone number, and sometimes email or other contact information. It also collects and uses health-related information (PHI), including prescription details (medication name, dosage, instructions, refill status), prescribing provider information, allergy information, and relevant diagnosis or treatment context needed to determine whether a refill is appropriate. The system may also store refill history, pickup or delivery status, and notification preferences. For pharmacy staff and authorized users, the system collects PII such as name, employee ID, job role (e.g., pharmacist, pharmacy technician), and system login credentials (username and password). This information is used to ensure only authorized staff can access pharmacy records and to track which user processed or updated a refill request for accountability, auditing, and quality control purposes. In addition to patient and staff information, the system also maintains operational and transactional data. This includes refill requests submitted by patients, prescription processing status, timestamps of actions taken, dispensing records, and notification logs (such as text messages or phone alerts sent to patients). This information helps ensure prescriptions are processed efficiently and that patients are informed when their medications are ready. Information in the system may be shared internally with other authorized IHS pharmacy or electronic health record systems to confirm prescription details, verify eligibility for refills, and ensure continuity of care. Notifications may also be shared directly with patients through secure messaging, phone calls, or text alerts to inform them of refill status and pickup or delivery availability.

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

The Pharmacy Refill Application is a system that allows patients to request prescription refills through an automated phone line, mobile application, or online portal, while enabling pharmacy staff to receive, review, and process those requests. To perform these functions, the system collects and maintains basic patient information such as name, date of birth, phone number, address, and patient or medical record number to confirm identity and locate the correct record. It also collects prescription-related information, including prescription number, medication name, dosage, prescribing provider, and refill status, as well as communication details such as preferred pharmacy location and notification preferences. The system may temporarily or permanently store records of refill requests, transaction history, timestamps, and system-generated data (such as call recordings or session details) to support operations, auditing, and security. The system primarily collects information about patients receiving care and, to a lesser extent, pharmacy staff involved in processing requests (such as user IDs and activity logs). Information is routinely retrieved using patient identifiers, most commonly name, date of birth, prescription (Rx) number, phone number, or patient/medical record number. This information may be shared with internal pharmacy systems and authorized healthcare personnel to ensure prescriptions are accurately refilled, prepared, and communicated to the patient. Overall, the system uses this information to safely and efficiently manage prescription refills and support continuity of care.

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

Mailing Address

Phone Numbers

Medical Records Number

Medical Notes

record of refill request, dosage, prescribing provider, refill status, as well as communication details such as preferred pharmacy location and notification preferences.

transaction history, session details, call recordings, timestamps

employee ID, job role (e.g., pharmacist, pharmacy technician),

session details

prescription number, medication name

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

Employees
Patients

How many individuals' PII is in the system?

100,000-999,999

For what primary purpose is the PII used?

The primary purpose of the PII in the Pharmacy Refill Application is to verify the patient's identity, locate the correct health record and prescription, and ensure that refill requests are accurately processed and delivered to the appropriate individual.

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

Secondary uses of PII in the Pharmacy Refill Application include supporting system operations, such as auditing, quality assurance, and performance monitoring, as well as maintaining records of refill activity for compliance and reporting purposes. PII may also be used to improve services, troubleshoot issues, and ensure system security and integrity.

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

5 U.S.C. 301, Departmental Regulations; 5 U.S.C. 552a, Privacy Act of 1974; 4 U.S.C. 2901, Federal Records Act; 42 U.S.C. 248, Section 321 of the Public Health Service Act, as amended; 42 U.S.C. 254a, Section 327A of the Public Health Service Act, as amended; 25 U.S.C. 13, Snyder Act; 25 U.S.C. 1601 et seq., Indian Health Care Improvement Act; and 2 U.S.C. 2001-2004, Transfer Act of 1954.

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.

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

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains
In-Person
Online

Identify the OMB information collection approval number and expiration date

Exempt from OMB Information Collection Number through Public Law 114-255, the 21st Century Executive Order, and the Paperwork Reduction Act, Section 2035: Exemption for IHS from the Paperwork Reduction Act requirements.

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.

Indian Health Manual - Part 2, Chapter 7 - It is IHS policy to provide adequate notice of its uses and disclosures of Protected Health Information (PHI) and of the individual's rights and IHS' legal duties with respect to PHI. A copy of the Notice is provided to new patients, patients whose charts are reactivated, and patients who reach legal age. A copy of the notice is given to the patient upon establishing a record or when requested. The staff member providing the notice has the patient acknowledge receipt of the Notice by signing the Acknowledgment of Receipt of IHS Notice of Privacy Practices. The signed Acknowledgment of Receipt of IHS Notice of Privacy Practices" is filed into the patient's medical record. The notices are displayed in the facility as well as on IHS website. IHS employees are notified at the time of hire that their Personally Identifiable Information (PII) will be collected and give consent as it is part of the 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.

If the patient does not want to provide PII, they can opt to receive healthcare at another healthcare facility.

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

It is IHS policy to provide adequate notice of its uses and disclosures of PHI/PII and of the individual's rights and IHS' legal duties with respect to PHI/PII. The IHS prominently and clearly displays the Notice in every facility. A copy of the Notice is also provided to new patients, patients whose charts are reactivated, and patients who reach legal age. The Patient Registration Office or other appropriate department provides a copy of the current Notice to the patient. The patient acknowledges receipt of the Notice by signing the Acknowledgment of Receipt of IHS Notice of Privacy Practices. An IHS staff member signs and dates the Acknowledgement form and files the signed "Acknowledgement of Receipt of IHS Notice of Privacy Practices" into the patient's medical record. No less than every three years, IHS provides notification of the availability of the Notice and how to obtain the Notice. If the Notice is revised by a material change, the revised Notice must be posted in clear and prominent locations in every facility and on its web site, on or after the effective date of the revision. The revised Notice will be posted on the IHS website within the 60 days of a material revision. The revised Notice is also given to all patients who come into a facility after the effective date of the revision and is available upon request on or after the effective date of the revision. Additionally, IHS provides the revised notice to all eligible patients registered in the patient registration system within 60 days of the revision of the Notice. Any individual, whether or not a patient, has the right to request and receive a copy of the Notice at any time, except an inmate. Inmates have no rights to the Notice (45 CFR § 164.520 (a)(3)).

IHS employees are notified at the time of hire that their PII will be collected and give consent as it is part of the on-boarding process.

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.

According to IHS policy all complaints regarding Health Insurance Portability and Accountability Act, Privacy and Privacy Act violations shall be addressed to the Chief Executive Officer or designee. Complaints must be documented, maintained, and filed, and include a brief explanation of resolution, if any. Note: Individuals may also file complaints directly to the Secretary, Department of Health and Human Services (HHS).

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 system follows a regular review process to ensure PII remains accurate, complete, and relevant. Pharmacy staff and IT personnel periodically check and update patient information, verify prescription and contact details, and remove or correct outdated data. These reviews help maintain data integrity, availability, and reliability for safe and effective refill processing.

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.

Access to PII is role-based and assigned to personnel based on their current job responsibilities. An administratively created account is required to gain access to the stored PII data.

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.

Appropriate access is granted to the system based on predefined roles and job descriptions, and administrative access is limited to authorized employees based on current roles.

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 employees of IHS and direct contractors are required to complete IHS Security Training and Awareness, IHS Information Systems Security Awareness annual training"

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

All employees of IHS and direct contractors are required to complete HIPAA Privacy, HIPAA Security, Privacy Act Basics, and 42 CFR Part 2 training modules on an annual basis.

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.

This system serves as a secondary repository and is not the official system of record. The primary records are maintained and managed under a separate, applicable records retention schedule. Records maintained within this system are managed in accordance with General Records Schedule (GRS) 5.1-010: Common Office Records. These records are temporary in nature and will be destroyed when business use ceases.

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

Administrative Controls: All personnel who access IT systems which contain protected information have met background investigation criteria for Public Trust positions. All personnel have taken mandatory security and privacy training classes and annual refreshers. Administrative personnel accessing these systems use privileged and separate accounts for administrative access.

Technical Controls: Access controls lists and event logs are maintained and monitored to detect unauthorized, suspicious or malicious activity. Access lists are restricted to approved IT technical

personnel. Two factor authentication must be used for access. File integrity and auditing software are employed on hardware.

Physical Controls: The information technology (IT) hardware used to host protected information is located in a secured IHS facility. The facility is only open to authorized personnel whose access is monitored by locking doors with badge readers for both ingress and egress. Each discrete ingress and egress event is logged. The facility is under 24-hour surveillance by facilities security for security and environmental hazards.