US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

03/06/2026

OPDIV:

IHS

Name:

Q Flow Pharmacy Management Queuing System

PIA Unique Identifier:

P-8431122-360230

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.

Q-Flow is a queue management and workflow tracking system used in the pharmacy to manage prescription processing and patient wait times. It helps staff monitor the status of prescriptions—from entry to verification and dispensing—while prioritizing tasks efficiently. The system provides real-time visibility into workload, helping improve workflow organization, reduce delays, and enhance patient service quality.

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

The Q-Flow system collects and stores information related to pharmacy workflow and patient service tracking, including patient identifiers (name, phone numbers, date of birth, Medical Record Number, mailing address), prescription details. This data is used to manage prescription processing, monitor workload, and improve service efficiency.

Pharmacy staff access Q-Flow through authorized user accounts. The system collects and maintains user credentials (e.g., usernames and passwords) to support authentication and role-based access,

ensuring that only authorized pharmacy personnel can access the system.

Q-Flow is not directly linked to or integrated with any IHS pharmacy systems (e.g., Resource and Patient Management System (RPMS). Patient and prescription information used in Q-Flow is manually entered or referenced by authorized pharmacy staff and is used solely for internal workflow tracking purposes.

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

The Q-Flow system is a pharmacy queue and workflow management tool used to track prescription processing and patient service status. It collects and stores patient identifiers (name, phone numbers, date of birth, MRN, and mailing address) and prescription-related workflow details to support pharmacy operations. Operational patient data are retained for a limited period in accordance with IHS records management policies and are not maintained permanently. Security and audit-related system logs, when applicable, may be retained for up to six (6) years to support HIPAA Security Rule compliance, after which they are erased.

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

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 PII is used primarily to accurately identify patients and link them to their prescriptions, ensuring correct medication dispensing, efficient workflow management, and proper documentation of pharmacy services.

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.

Information use and disclosure within Q-Flow are governed by the Health Insurance Portability and Accountability Act (HIPAA) of 1996, the Privacy Act of 1974 (5 U.S.C. § 552a), and applicable Indian Health Service (IHS) and Department of Health and Human Services (HHS) privacy and security policies.

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.

The Q-Flow system is covered under the Privacy Act System of Records Notice (SORN) #09-17-

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Hardcopy

Identify the OMB information collection approval number and expiration date

This system does not require OMB approval for information collection under the Paperwork Reduction Act, as Q-Flow only collects information necessary for internal pharmacy operations and patient service management. Therefore, no OMB control number or expiration date applies.

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.

Individuals are notified that their personal information will be collected through standard patient intake and registration processes, which include Privacy Act and HIPAA notices provided at the time of service. These notices explain how their information may be used for treatment, payment, and healthcare operations. No additional notice is required within Q-Flow, as the system operates under existing patient consent and privacy disclosures.

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.

There is no option for individuals to opt out of the collection or use of their PII in Q-Flow, as the information is required for the provision of pharmacy and patient care services. Collecting this data is necessary to ensure accurate patient identification, safe medication dispensing, and compliance with healthcare regulations such as HIPAA and DEA requirements.

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

If major changes occur to the Q-Flow system that affect how PII is used or disclosed, individuals will be notified through updated Privacy Act and HIPAA notices provided by the facility and published through official IHS or HHS communication channels. These notices outline new data uses, sharing practices, or system updates. Individual consent is obtained when required by law or policy. If direct notification is not feasible, notice will be provided through public posting and policy updates, consistent with federal privacy and disclosure requirements.

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.

Individuals who believe their PII has been inappropriately obtained, used, disclosed, or recorded inaccurately may submit a privacy complaint through the facility’s Privacy Officer or HIPAA Compliance Office. The complaint is reviewed in accordance with IHS and HHS privacy and security policies, and corrective actions are taken as necessary, including investigation, mitigation, and notification if required. Individuals may also request amendments to their records following procedures outlined under the Privacy Act of 1974 and HIPAA Privacy Rule.

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

Periodic reviews of PII within the Q-Flow system are conducted as part of routine system audits and data quality assessments managed by the pharmacy and IT departments. These reviews ensure that data remains accurate, current, and relevant to patient care and operational needs. Automated

system checks, user access reviews, and periodic validation of patient and prescription information are performed in accordance with IHS data integrity and security policies to maintain compliance and system reliability.

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 in the Q-Flow system is determined based on role-based access controls (RBAC) and the principle of least privilege. User roles—such as pharmacists, technicians, administrators, and IT support—are assigned specific access levels according to job responsibilities. Access requests must be approved by management or the system administrator, and all users must complete privacy and security training before being granted access. Permissions are reviewed periodically to ensure continued alignment with current duties and compliance with IHS and HHS security policies.

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.

The Q-Flow system enforces the minimum necessary access principle through role-based permissions that restrict users to only the data elements required for their specific duties. For example, pharmacy technicians can view prescription and patient identifiers needed for dispensing, while administrators have limited access for system maintenance without viewing full patient details. System configurations, access logs, and periodic audits ensure that users cannot access or retrieve information beyond their authorized scope, maintaining compliance with HIPAA and IHS privacy policies.

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 personnel with access to the Q-Flow system—including system owners, managers, operators, contractors, and program staff—are required to complete annual HIPAA Privacy and Security training, as well as IHS and HHS information security awareness training. This training emphasizes responsibilities for safeguarding PII, proper system use, incident reporting procedures, and adherence to federal privacy regulations. Additional role-specific or refresher training is provided as needed to ensure ongoing compliance and accountability.

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

In addition to standard security and privacy awareness training, Q-Flow system users receive role-specific training focused on proper system operation and handling of patient information. This includes instruction on workflow management, access controls, data entry accuracy, and audit trail procedures. Users are trained on how to limit access to the minimum necessary information, recognize potential privacy risks, and follow established protocols for reporting security or privacy incidents. Refresher training is provided when system updates or policy changes occur.

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.

Elements of PHI/PII are stored and maintained as needed within QuickCollect RX to identify and track patients' medication prescriptions and distribution. The PHI/PII elements are stored securely and disposed of properly when no longer needed. The medication order will remain in the medical

record and be destroyed/deleted 75 years after last episode of patient care or date of death per IHS record retention schedule/disposition authority DAA-0513-2014-0003.

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

PII in the Q-Flow system is protected through a combination of administrative, technical, and physical safeguards. Administratively, user access is restricted based on role and job function, with all personnel required to complete annual privacy and security training. Technically, the system uses encryption for data in transit and at rest, secure network connections within the IHS domain, automatic session timeouts, and activity logging to monitor user actions. Physically, servers are stored in secure, access-controlled facilities, and workstations are located in restricted pharmacy areas. These controls work together to ensure the confidentiality, integrity, and availability of all PII in the system.

Note: web address is a hyperlink.