US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

06/27/2025

OPDIV:

IHS

Name:

Ultrasound

PIA Unique Identifier:

P-3560262-101613

The subject of this PIA is which of the following?

General Support System (GSS)

Identify the Enterprise Performance Lifecycle Phase of the system.

Implementation

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)?

Yes

Indicate the following reason(s) for updating this PIA.

Describe the purpose of the system.

t the Indian Health Service (IHS), an ultrasound machine is used primarily to provide medical imaging to support the diagnosis and monitoring of various health conditions in patients.

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

The patient information collected is name, date of birth (DOB), medical record number, password, user credentials, date of service, type of scan, and the providers name. Information is only stored temporarily and purged every 30 days from the machine. Images are stored in Picture Archiving and Communication System (PACS).

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

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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
Medical Records Number
Medical Record Number
user credentials, date of service, type of scan, and the providers 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?

To identify the patient for testing and to link the scan results to the patients medical record once complete.

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.

5 USC 301, Departmental Regulation

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
Government Sources
Within the DOC

Identify the OMB information collection approval number and expiration date

N/A

Is the PII shared with other organizations?

Yes

Identify with whom the PII is shared or disclosed and for what purpose.

Describe any agreements in place that authorizes the information sharing or disclosure.

Not Applicable.

Describe the procedures for accounting for disclosures.

If information is shared with outside providers, then this is documented and completed through Health Information Management department

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 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. The Patient Registration Office provides a copy of the current Notice to the patient. The staff member has the patient acknowledge receipt of the Notice by signing the Acknowledgment of Receipt of IHS Notice of Privacy Practices. The signed "Acknowledgement of Receipt of IHS Notice of Privacy Practices" is filed into the patient's medical record.

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.

Per National Safety Patient Goals, two patient identifiers must be verified prior to any medical service being conducted. This is a regulatory compliance and patient safety mandate.

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 (2-7.18) in every facility (http://www.hipaa.ihs.gov/). 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 ap-propriate department provides a copy of the current Notice to the patient. The patient acknowledges re-ceipt 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 pro-vides 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 web-site 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)).

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.

If the PII used for diagnostic testing is what is on record in the patients medical record. If this is incorrect, then the patient will provide the proper documentation to update the record. Each visit, the patients demographics are verified and updated as necessary to prevent such issues.

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

There are no process in place for review. The images and and patient data is deleted every thirty days and not permanently stored by the system.

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.

Only the Ultrasound technician will have access to the machine. They are required to take privacy training annually.

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.

Only minimal PII is obtained by the medical imaging staff for diagnostic testing. They only access information on need to know basis.

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.

They are required to take Information Systems Security Awareness (ISSA), privacy, and HIPPA training.

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

The user is trained on how to use the machine and troubleshoot problems

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.

All imaging is digital and maintained by the official Electronic Health Record. There is no destruction of these records as they are maintained indefinitely as part of the patients medical record. The images on the ultrasound machine are not permanent and are purged every thirty days

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

The instrument is password protected, only authorized users may gain access. The ultrasound machine is located in dedicated ultrasound room, not shared with any other modalities. This room is located in a secure department, not accessible to the public and only accessible with PIV/Proxy Card access.