



Privacy Impact Assessment

Full Entry Name: **Electronic Health Record System**

NASA Center: **NASA Headquarters**

Office/Mission Program/Project Supported: **Office of the Chief Health and Medical Officer**

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System Overview: The Office of the Chief Health and Medical Officer (OCHMO) has implemented an Electronic Health Record System (EHRS) in support of the NASA Occupational Health (OH) program. The EHR's objective is to replace the paper-based medical records with electronic health records. This software serves to document OH clinic visits by employees at NASA sites. The EHRS manages clinic visit and industrial hygiene information required by Occupational Safety and Health Administration (OSHA) and the Federal Employees' Compensation Act (FECA).

| Privacy | |
|---|---|
| Collection contains the following: (check the applicable items) | Date of Birth, Employment status and/or records, Financial account information, Home mailing address, Home phone number, Medical notes, Medical records numbers, Name, SSN, UUPIC, Work mailing address, Work phone number, and X-ray |
| The application/website/information system stores, collects, or maintains Information in Identifiable Form (IIF). | Yes |
| Information is collected on the following: | Government Employees and NASA Contractors |
| The collection of PII is justified. | Yes |
| Law, regulation, or Government-wide policy justifies the collection of the information. | 42 U.S.C. 2472; 44 U.S.C. 3101; Pub. L. 92-255 |
| NASA will use the information in the following ways: | The Identifiable Information creates the framework for individual specific medical record files within the electronic health record system (EHRS). The EHRS documents Occupational Health clinic visits by individuals at NASA sites as well as accidents, medical surveillance, and Industrial Hygiene surveillance within NASA centers. |
| The collection is the minimum necessary to accomplish the purpose of the collection. | Yes |
| Consent | |
| The IIF is collected. | Mandatory, Comment: Some data from HR feed. The data feed containing employee information is acquired automatically once per week on a fixed schedule through a secure link between the enterprise directory server at NASA and a secure server housing the EHRS within NASA network. Other minimum data may be required for optimum patient care. |
| There is a process in place for the following | |
| Ensuring consent is obtained from the individuals whose IIF is stored, collected, or maintained. | Yes (The Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule is followed to ensure health information privacy. Each individual visiting the clinic is provided with a HIPAA Privacy consent form to sign permitting the clinic to collect their information for medical reasons. The form is the stored as part of the individual's paper based portion of the medical record.) |
| Allowing the individual whose IIF is stored, collected, or maintained to choose how their IIF is used. | No (The identifiable information used to establish the foundation records within this system is provided by individuals through the Office of Human Resources upon initial employment, and is derived from the NASA Enterprise Directory database, which results in continuous updates of the information automatically maintaining consistency and accuracy of the information. Information contained in EHRS is further managed and maintained in accordance with NASA System of Records Notice, 10HIMS.) |
| Security Controls | |
| Monitor and Response to privacy and/or security incidents policies. | Yes |
| Access controls: | Yes |
| Technical controls (safeguards) are in place to minimize the possibility of unauthorized access, use, or dissemination of the IIF in the application/website/information system/cloud system. | Yes |
| Information Sharing Practices | |

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|---|---|
| The application/website/information system/cloud systems collects IIF from other resources (e.g., databases, websites) | Yes (The Electronic Health Record system acquires IIF from NASA Enterprise Directory through a secure electronic connection.) |
| The application/website/information system/cloud system populates data for other resources (e.g., databases, websites, or external agencies, people, or organizations). | No |
| Accessibility, Redress, Complaints | |
| There is a process in place for periodic reviews of IIF in the system to ensure data integrity, availability, accuracy, and relevance. | Yes (The IIF is reviewed weekly by authorized Electronic health Record system database administrators to confirm data quality and absence of errors.) |

Privacy Act of 1974

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|---|--------------------------------------|
| Records on individuals are or will be routinely retrieved from the system by using individual's name or other unique identifier (e.g., personal account number, UUPIC, SSN, etc. is used to locate information about an individual in the application/website/information system/paper record). | Yes |
| The records in the system are covered by an existing published System of Records Notice (SORN). | Yes |
| The SORN Name. | Health Information Management System |
| The SORN Number. | NASA 10HIMS |

Paperwork Reduction Act

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|---|---------------|
| The record/application/website/information system collects information (PII, IIF or any other information), in a standard way (via forms, surveys, questionnaires, etc.), from 10 or more persons (e.g., members of the public, NASA contractors, grantees or other). | Yes |
| There is an OMB Control Number. | Yes |
| The OMB Control Number. | OMB-1218-0065 |

Web Measurement and Customizing Technology

| | |
|---|----|
| The Application/Website/Information System Utilizes Web Measurement and Customization Technology (Cookies/Persistent Tracking). | No |
|---|----|

Concur:

/s/ Concurred

VINCENT J MICHAUD

System Owner

Date: 07/16/2014

Concur:

/s/ Concurred

MARION C MEISSNER

Center Privacy Manager

Date: 09/18/2014

Concur:

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BRYAN D MCCALL

NASA Privacy Program Manager

Date: 09/18/2014

Approve:

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Date: 09/19/2014