AmeriCorps
Privacy Impact Assessment (PIA)

1- GENERAL SYSTEM INFORMATION		
1-1	Name of the information system:	AmeriCorps Health Benefits System (AHB)
1-2	System Identifier (3 letter identifier):	AHB
1-3	Unique Investment Identifier (Exhibit 53):	485-000000030
1-4	Office or entity that owns the system:	AmeriCorps
1-5	Office or entity that manages the system:	International Medical Group, Inc. (IMG)
1-6	State if the system is operational or provide the expected launch date:	Operational
1-7	System's security categorization:	Moderate
1-8	Date of most recent Security Assessment and Authorization (SA&A) or why one is not required:	November 2022
1-9	Approximate number of individuals with PII in the system:	107,217 Members & 7,980 Provider Representatives

3- SIGNATURES (ORIGINAL MAINTAINED BY CHIEF PRIVACY OFFICER)			
	Role	***Signature***	***Date***
3-1	**Information System Owner:**		
3-2	**Office of General Counsel:**		
3-3	**Chief Privacy Officer:**		
3-4	**Chief Information Security Officer:**		
3-5	**Senior Agency Official for Privacy:**		

4- PIA HISTORY	
4-1	**State whether this is the first PIA for the system or an update to a signed PIA.**
	Updated PIA.
4-2	**If this is an update, describe any major system changes since the last PIA. If this is the first time a PIA is being completed, write Not Applicable.**
	AHB systems, related policies, procedures and System Security Plan have undergone changes to support selected NIST (National Institute of Standards and Technology) 800-53 Rev 5 controls implemented to AHB categorized as system of moderate risk level.
4-3 A	**State whether this is the annual review of PIA.**
	This is a PIA update.
4-3 B	**Describe any changes to the system, data activity, policies, procedures, any interrelating component and process, vendor, 3rd parties, contracts and any required controls since last PIA.**
	AHB systems, related policies, procedures and System Security Plan have undergone changes to support selected NIST (National Institute of Standards and Technology) 800-53 Rev 5 controls implemented to AHB categorized as system of moderate risk level. This includes new policies and procedures regarding privacy and supply chain risk Management specifically.
4-3 C	**Describe objects and results of audit or tests (continuous monitoring).**
	Baker Tilly US, LLP conducted a NIST 800-53 Rev 5 Control Gap assessment in 2022 for IMG and its AHB system, IMG had 11 controls identified as partially satisfied. These controls are successfully remediated in 2023.

4-3 D	Certify and state "Completion of Review" if no change occurs.
	Not Applicable.
4-4	If the system is being retired, state whether a decommission plan is completed and attach a copy.
	Not Applicable.

5- SYSTEM PURPOSE	
5-1	Describe the purpose of the system.
	Any member ("Member") of AmeriCorps Vista, AmeriCorps NCCC and AmeriCorps FEMA Corps may enroll in one of the three free healthcare benefit programs offered by AmeriCorps listed below that will reimburse some of the Members' healthcare costs: *AmeriCorps* VISTA *Healthcare Allowance, which* is available to VISTA members who already have their own health coverage.\ *AmeriCorps* VISTA *Healthcare Benefit Plan, which* is available to VISTA members who do not have health coverage. New VISTA members who do not have any health coverage may also enroll in this plan for 60 days while they work to obtain other coverage, such as a marketplace plan or joining a family member's plan. *AmeriCorps* NCCC *Health Benefit Plan, which* is available to all NCCC and FEMA Corps members regardless of whether they have other health coverage. IMG is a healthcare management company that received a contract from AmeriCorps to run AHB and manage the above healthcare benefit programs. Authorized IMG personnel will use AHB to track and manage some of the information needed to administer this contract. AHB includes modules that are only accessed by authorized IMG personnel (e.g., to review claims and manage customer service requests). AHB also includes a website where Member can login to view their claims information, download documents and identification (ID) cards, and communicate with customer service representatives via chat and secure messages. IMG has subcontracts with: - UniversalRX to help manage pharmacy benefits (i.e., review and pay for pharmacy claims). - Clear Health to help manages provider benefits (i.e., review and pay for visits to medical providers). - Teladoc to provide phone-based medical care to all enrolled Members.

6- INVENTORY OF PII	
6-1	**Provide a list of all the PII included in the system.**
	The following elements of PII may be collected and stored in AHB: • Full Name • Gender • Date of birth and age • Home and/or cellular number • Email address • Address (payment, current, and permanent) • National Service Participant ID (NSPID) number • Exemption Certification Number (ECN) from Health Insurance Marketplace (no longer applies to new Member) • IMG Member ID • Bank Account information (i.e., Name on account, name of bank, account number, and routing number) • ID Number from other insurance carriers

7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM	
7-1	**Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.**
	• AHB maintains PII about all current and former VISTA members who served since September 2014, all current and former NCCC and FMEA Corps members who served since July 2016, and a small number of current and former Members who served before those times and had an ongoing medical claim. • AHB currently maintains PII on approximately 107,217 Members. • AHB maintains PII about at least one representative for each of the approximately 7,980 providers who served Members. • AHB maintains PII about the individuals whose insurance policy covers the enrolled Members. • AHB maintains PII about individuals who may have been involved in or have information about an accident or injury that occurs when a Member is serving and results in a Member seeking medical care (e.g., other individuals involved in the accident, lawyers for the parties, and police who investigated the accident).

8- INFORMATION IN THE SYSTEM		

8-1 A	For each category of individuals discussed above:
	    a. **Describe the information (not just PII) collected about that category.**
	    b. **Give specific details about any PII that is collected.**
	    c. **Describe how the information is used.**	

	Every workday, AmeriCorps sends AHB an electronic file containing each Member's full name, date of birth, gender, addresses (payment, current, permanent), phone numbers, start and end date of service term, type of member and role, and NSPID Number. AHB uses this information to determine who is eligible to receive the healthcare benefits discussed above. Most Members enroll because the programs are free and can significantly reduce their healthcare costs. Members who want to enroll must provide information about any other health benefits plan (e.g., policyholder name, policyholder date of birth, and policy numbers they have. This is required so IMG can determine who should cover what costs). Members who want IMG to pay a medical expense which indicates that they may have been involved in an accident must provide information about the accident (e.g., what occurred, where it occurred, injuries received), the healthcare services rendered (e.g., provider's name and address, care provided, date of care, and cost), and who may be responsible (e.g., name and address of other parties to the accident, Insurance carriers involved in the accident, police reports, and legal counsel representing the member). Authorized IMG personnel may use this information to obtain a reimbursement from the responsible parties. Members who want to be paid for their medical care and want a reimbursement from IMG must provide their banking information (e.g., name of account holder, account number, routine number, and bank contact information). Members must contact customer service for assistance and may have notes from their communications added to their file in AHB. Some of this information is collected through forms available on IMG's website: VISTA enrollment forms, claim submission forms, and NCCC and FEMA Coordination of Benefit (COB) forms.	
OM 8-1 B	**State whether the system derives new data, or creates previously unavailable data, about an individual via aggregation of information or other means. Explain why, how it is related to the purpose of the system, how it is used and with whom it is shared.**	
	IMG does not derive or create previously unavailable data for individuals.	

8-1 C	**If the system uses commercial or publicly available data, explain why, how it is related to the purpose of the system, and how it is used.**
	IMG leverages public zip code repository data that IMG updates annually for internal records and pulls currency exchange data daily which help maintain financial and geographical data for AmeriCorps.
8-1 D	**Describe any application of PII redaction, mask, anonymization or elimination.**
	IMG anonymizes and eliminates PII data when restoring or refreshing any databases or applications maintaining PII or when promoting any data to a lower-level environment per standard rules and practice.
8-1 E	**Describe any design that is used to enhance privacy protection.**
	Obscuring user ID and password with website logins, user's login information is not available to IMG employees, IMG also provides required privacy and Security training to IMG employees, and only screened IMG employees can work on AHB systems.

9- COLLECTIONS OF PII INTO THE SYSTEM	

9-1	Describe for each source of PII in the system:
	   a. The source.
	   b. What comes from that source.
	   c. How the PII enters the system.

	Every workday, AmeriCorps eSPAN system electronically sends AHB an encrypted file containing members' full name, date of birth, gender, address (payment, current, permanent), phone numbers, start and end date of service term, type of member and role, and NSPID Number. AHB collects PII from members such as the member's enrollment documents (e.g., name, contact information, other insurance coverage) and banking information. Other PII of a Member can be provided by the Member or a third party at a Member's request. For example, a Member can ask a provider to submit claims to IMG on their behalf or give IMG permission to pursue payment from another insurance company instead of directly pursuing the payment. AHB also collects some PII from Member which is about another individual, such as the policyholder of their insurance coverage (e.g., name, date of birth, and relationship to member) or the other individuals who are involved in an accident (e.g., name, address, and relationship to accident).

9-2	**If any PII comes directly from the individual, describe the privacy controls in place. If all PII comes from a secondary source, write <u>Not Applicable</u>.**
	Members can communicate with AHB program through mail, fax, the website, and email.
	IMG uses several methods to notify Members about the use of their PII. The enrollment forms ask if IMG may request information from healthcare organizations on their behalf.
	All IMG forms clearly state the purpose of the forms and what PII a Member is expected to provide, which should limit the chance of a Member providing PII that is not requested and required.
	If a Member choose to use the IMG website: - The login page states that Members who use the website are providing their PII to IMG, and their activities while using the website may be tracked. - The footer of every webpage includes a link to IMG's Privacy Policy. - Members receive a Privacy Act Statement at or before they provide PII collected by IMG into AHB, with information of the system of records notice covering the PII handling activities of AHB.
	All paper forms that collect information into AHB include the following notice:
	Notice on Electronic Communication and Privacy: Please submit these documents via secure means, such as encrypted email or by fax. If you choose to send the information via unsecure email, you are solely responsible for any subsequent data breach or data loss caused by your decision. To protect your confidential information, we recommend you consider using any secure or confidential/encrypted email sending options with your email service provider. You may also consider password protecting your documents and send in the password in a separate email.
	All PII data collected from Members into the system is encrypted in transit and at rest. IMG has access control policies implemented and only authorized personnel are able to access AHB data. The data is maintained and disposed of per identified record retention schedule applicable to AmeriCorps' records.
9-3	**If PII about an individual comes from a source other than the individual, describe:** a. **Why the PII is collected from the secondary source.** b. **Why the PII from the secondary source is sufficiently accurate.** c. **If/how the individual is aware that the secondary source will provide their PII.**

	If all PII about an individual comes directly from the individual, write <u>Not Applicable</u>.
	Member's eligibility information is imported from AmeriCorps which is provided and updated daily. It is the official record showing if an AmeriCorps Member is eligible for a health benefit plan. All Members are informed about IMG's services when they join AmeriCorps VISTA, NCCC, or FEMA Corps. Some PII comes from a third party when requested by a Member to serve as an intermediary. For example, a Member can authorize a provider to submit reimbursement forms directly to IMG instead of sending them to the member for submission to IMG. Some PII about a third party is provided by Member, such as the name of a policyholder or the name and contact information of the other individuals who are involved in an accident. Authorized IMG personnel are required to work with the Member and third party to confirm the PII before it is used.
9-4	**If any collections into the system are subject to the Paperwork Reduction Act (PRA), identify the Office of Management and Budget (OMB) Control Number for the collection. If the system does not implicate the PRA, write <u>Not Applicable</u>.**
	Not Applicable.
9-5	**If any collections into the system are subject to an agreement, describe those agreements. If no agreements are relevant, write <u>Not Applicable</u>.**
	IMG's contract with AmeriCorps states that: (1) IMG and any subcontractors will protect any PII collected from the Members; (2) AmeriCorps owns all member data maintained by IMG and its subcontractors; and (3) IMG and its subcontractors are obligated to transfer that data to AmeriCorps when the contract ends.

10- SYSTEM ACCESS	
10-1	**Separately describe each category of individuals who can access the system along with:** a. **What PII they can access (all or what subset).** b. **Why they need that level of access.** c. **How they would request and receive that access.** d. **How their access is reduced or eliminated when no longer necessary.**
	Apart from Member's accessing their own accounts, only staff approved and vetted have direct access to AHB. This includes approximately 65 IMG staff and contractors responsible for managing the software and services (e.g., IT Systems

Administrators, medical staff, and claims processors). Vetted staff can all view and edit a member's records as they require access to complete their job duties. IMG has written policies, procedures, security and privacy controls, and responsibilities regarding whom should have direct access to AHB and the PII it contains. AmeriCorps member data is available to IMG staff with defined job role security to the data.

IMG has defined access control policies and procedures utilized to onboard and terminate access for all employees. In addition, a further vetting process is defined and utilized for staff who will have access to the AHB systems and data. IMG Security Operations department conducts Quarterly Access reviews to ensure only the necessary staff have access to the AHB system. Any terminated staff have their IMG access deprovisioned and revoked immediately including access to the AHB system.

11- PII SHARING	

11-1	**Separately describe each entity that receives PII from the system and:**
	    a. **What PII is shared.**
	    b. **Why PII is shared.**
	    c. **How the PII is shared (what means/medium).**
	    d. **The privacy controls to protect the PII while in transit.**
	    e. **The privacy controls to protect the PII once received.**
	    f. **Any agreements controlling that PII.**
	
	If PII is not shared outside the system, write <u>Not Applicable</u>.

PII from AHB may be share with authorized AmeriCorps and IMG staff, contractors, and subcontractors. Every workday, IMG received limited information from eSPAN and provides it through secure portals https and sFTP for secure transfer to the following subcontractors:

- UniversalRx. IMG has a contract with this company to manage the pharmacy benefits. UniversalRx uses the extract, with information form Members about their prescriptions, to confirm that prescriptions are covered and process a reimbursement.
- Optum. IMG has a contract with this company to manage the provider benefits. Optum uses the extract, with information from Members about their medical visits, to confirm that visits are covered and process a reimbursement.
- Teladoc. IMG has a contract with this company to provide phone-based medical care to Members. The vendor merges the extract with records on the care provided to Members during their calls.
- Clear Health. IMG has a contract with this company to manage the provider benefits. Clear Health uses the extract, with information from Members about their medical visits, to confirm that visits are covered and

process a reimbursement.

All other disclosures would require a Member's express consent, or a legal requirement established by the Federal government.

The privacy controls in place to protect PII in transit are the use of secure portals using HTTPS, sFTP, Email Encrypt Option and TLS. The privacy controls in place to protect PII once received are Active Directory Account Management, data at rest encryption, encryption backups, bitlocker, and IMG Governance Risk and Compliance Committee.

12- PRIVACY ACT REQUIREMENTS	

12-1	**If the system creates one or more systems of records under the Privacy Act of 1974:**
	    a. **Describe the retrieval that creates each system of records.**
	    b. **State which authorities authorize each system of records.**
	    c. **State which SORNs apply to each system of records.**
	If the system does not create a system of records, write <u>Not Applicable</u>.

	AHB may retrieve a Member information by the following personal identifiers: name, phone number, email, date of birth, IMG Member ID, or NSPID Number. IMG creates and assigns an IMG Member ID to each individual Members to track their information across AHB and any other MG databases; the ID is not used outside IMG. AHB does not retrieve provider representatives' information by a personal identifier. AmeriCorps CNCS-11-CPO-AHB–AmeriCorps Health Benefits System of Records Notice (https://www.federalregister.gov/documents/2023/07/28/2023-16026/privacy-act-of-1974-system-of-records) applies to the records created by this system of records. The other PII of the Members extracted from AmeriCorps eSPAN are covered by AmeriCorps CNCS-04-CPO-MMF-Member Management Files System of Records Notice.

13- SAFEGUARDS	
13-1	**Describe the technical, physical, and administrative safeguards that protect the PII in the system.**
	The safeguards that AHB has put in place include but are not limited to: First, all electronic data is encrypted at rest and in transit using FIPS 140-2 encryption protocols. Data is restricted to authorized users who have passed the

required Federal background clearance process, and each authorized user has a unique login ID. The AHB servers and any paper records are protected by physical safeguards such as security guards, close circuit cameras, Proximity ID badges, and locking cabinets or rooms. Other electronic controls include physical firewalls, external certificate authorities, auditing (i.e., logging who accesses our systems and data), testing with sanitized data, and a web application firewall. Software is used for vulnerability scanning and additional software is used for event correlation and logging.

Second, each IMG employee and contractor who works on AHB is required to sign an employee handbook Rules of Behavior (ROB), confidentiality or non-disclosure agreement, and complete security training during orientation to make sure they know how to handle the data appropriately and the consequences of misuse. IMG is required to mandate its employees to complete a companywide annual security awareness training to address how to handle customers data of all types, refresh their awareness of the importance of the secure handling of data, and update on any new regulations or process changes. In addition, each department is required to conduct role specific training for each of their associates on how to handle data for their job.

Third, to meet the breach report requirement, IMG has a process in place to report breaches to AmeriCorps within required timeline.

IMG has Internal Data Handling and Disposal policy that IMG staff follow in its record handling practice, per AmeriCorps' federal record retention and disposition requirements.

13-2	**Describe the technical, physical, and administrative measures that protect PII if the system is being retired.**
	Not Applicable.
13-3	**State if a system security plan and privacy plan is completed and the date of control verification.**
	AHB SSP has been documented and updated in accordance with NIST SP-800-53 Revision 5 Control Requirements as of June 2022. A Privacy Plan is currently being developed by March 21st, 2023, a part of IMG's 2022 POA&M items.

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14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL	
14-1	**Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete.**
	Members are instructed to review and update their PII as required. They may change it by: (1) downloading and submitting forms via email, fax, or mail. (2) logging into the website and submitting the forms electronically, or (3) contacting IMG through mail, fax, email, and online chat service, or an online messaging service. Every weekday, IMG receives updated PII about Members' eligibility and their physical addresses. AHB was developed that only collects and uses information that is necessary and relevant to manage the health benefits of the Members, and ensure the information are current and complete.
14-2	**Describe how an individual could view, correct, update, or ask to amend their PII.**
	Members can view claims, benefits, and other documents by logging onto the website or requesting them from IMG. They are directed to update or amend their PII as required by (1) downloading and submitting forms via email, fax, or mail, (2) logging into the website and submitting the forms electronically, or (3) contacting IMG through mail, fax, email, an online chat service, or an online messaging service. Members are notified about benefits paid via an explanation of benefits statement delivered to them based on the method of delivery they chose when they set up their account.
14-3	**Describe how an individual could control what PII about themselves is included in the system or how it is used. Also describe how those decisions could affect the individual.**
	Members can decide not to enroll, which means the only PII about them in the system would be the PII sent from AmeriCorps in the daily extract. If they do not want IMG to know about a healthcare service they receive, they can pay for that service and not request a reimbursement from IMG by using AHB.
14-4	**State if PII handling processes apply automation technology for decision making and describe the measures taken to eliminate risk to privacy interests.**
	Not Applicable.

15- DATA RETENTION AND DESTRUCTION	
15-1	**Identify the National Archives and Records Administration (NARA) provided retention schedule for the system and provide a summary of that schedule.**
	The AHB records schedule is currently under review per amendment to Title 36, Chapter XII, Subchapter B, dated June 5th, 2023, and product records are being appraised to determine their current value. In the interim AHB records are to be maintained as retrievable and useable indefinitely until the record schedule is approved by National Archives and Records Administration (NARA).
15-2	**Identify the role and process to coordinate with the parties involved the record retention and disposition.**
	IMG has a documented procedure with identified roles for Record and Data retention and secure disposal. A designated personnel is responsible for coordinating record management and disposal.

16- SOCIAL SECURITY NUMBERS (SSNs)	
16-1	**If the system collects truncated or full social security numbers (SSNs):** a. **Explain why the SSNs are required.** b. **Provide the legal authority for the usage of the SSNs.** c. **Describe any plans to reduce the number of SSNs.** **If the system does not collect any part of an SSN, write <u>Not Applicable.</u>**
	Not Applicable.

17- WEBSITES	
17-1	**If the system includes a website which is available to individuals apart from AmeriCorps personnel and contractors, discuss how it meets all AmeriCorps and Federal privacy requirements. If the system does not include a website, write <u>Not Applicable.</u>**
	AHB uses a small number of tiers 2 — multi-session without PII cookies (defined in M-10-22, Guidance for Online Use of Web Measurement and Customization Technologies) to track visitors: • A Sitefinity cookie that counts how many times a computer visits a page is deleted no later than 180 days (about 6 months) after the last visit. • A Google cookie that translates the page into other languages is deleted no later than 2 years after the last visit. A Live Person cookie that identifies the computer when someone uses the live chat feature and locates their prior chat history is deleted no later than I year after the last visit. • The other cookies mentioned in the Privacy Policy (https://americorpsnccc.imglobal.com/legal/privacy) are either deleted

when the user leaves the website or do not apply to the AHB website.
- None of those cookies contain PII or can be used by another website to identify the user. The third parties that provide the cookies can only share the information collected through the cookies with IMG.

Although the cookies are enabled by default, users can block them by changing their browser settings. This might limit their ability to access parts of the AHB website, but they can obtain comparable service by calling or emailing IMG. All webpages include a link in the footer to the webpage's privacy notice.

18- OTHER PRIVACY RISKS	
18-1	**Discuss any other system privacy risks or write <u>Not Applicable</u>.**
	Not Applicable.