

# Corporation for National and Community Service

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## Corporation for National and Community Service (CNCS) Privacy Impact Assessment (PIA)

| 1- GENERAL SYSTEM INFORMATION |   |  |
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| 1-1                           | Name of the information technology (IT) 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:  | International Medical Group, Inc. (IMG)  |
| 1-5                           | Office or entity that manages the system:   | 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 (SA&A) or why one is not required:                      | November 2019  |
| 1-9                           | Approximate number of individuals with personally identifiable information (PII) in the system: | AHB is used to help administer a healthcare benefits program for current VISTA, NCCC, and FEMA Corps Members (Members). As of early 2019, AHB contained PII on approximately 58,597 Members and approximately 12,000 provider representatives; this is the majority of the PII in AHB. |

| 3- SIGNATURES (ORIGINAL MAINTAINED BY CHIEF PRIVACY OFFICER) |                                     |  |
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|  | Role                                | *Electronic Signature & Date*          |
| 3-1  | System Owner:                       | Signatures on file with Privacy Office |
| 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.**

This is the first PIA for AHB. The new IT system was developed to replace two prior CNCS legacy systems named *NCCC Health Benefits* and *VISTA Health Benefits*.

**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.**

Not Applicable.

#### 5- SYSTEM PURPOSE

**5-1 Describe the purpose of the system.**

All Members may enroll in one of three free healthcare benefit programs that will reimburse some of their healthcare costs:

- *AmeriCorps VISTA Healthcare Allowance* is available to VISTA Members who already have their own health coverage.
- *AmeriCorps VISTA Health Benefit Plan* is available to VISTA Members who do not have other 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* 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 CNCS 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 complete 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 Members 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).
- Equian 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; address (payment, current, and permanent); email address; telephone number; Exemption Certification Number (ECN) from the Health

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|   | Insurance Marketplace; IMG Member ID; National Service Participant ID (NSPID) Number; bank account information (i.e., name on account, name of bank, account number, and routing number); and ID Number for other insurance carriers.   |
| <b>7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM</b> |   |
| <b>7-1</b>  | <b>Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.</b>   |
|   | <p>AHB maintains PII about all current and former VISTA Members who served since September 2014, all current and former NCCC and FEMA 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. There are about 5,000 Members enrolled in a plan at any one time, and AHB currently maintains PII on approximately 58,597 Members.</p> <p>AHB maintains PII about at least one representative for each of the approximately 12,000 providers who served a Member.</p> <p>AHB maintains PII about the individuals whose insurance policy covers the enrolled Members.</p> <p>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 the Member seeking medical care (e.g., other individuals involved in the accident, lawyers for the parties, police who investigated the accident).</p> |

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| <b>8- INFORMATION IN THE SYSTEM</b> |   |
| <b>8-1</b>                          | <b>For each category of individuals discussed above:</b>  |
|                                     | <p><b>a. Describe the information (not just PII) collected about that category.</b></p> <p><b>b. Give specific details about any PII that is collected.</b></p> <p><b>c. Describe how the information is used.</b></p> <p>Every workday, CNCS 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.</p> <p>Almost all Members enroll because the programs are free and can significantly reduce their healthcare costs. Members who:</p> <ul style="list-style-type: none"> <li>• want to enroll must provide information about any other health benefits plan (e.g., policyholder name, policyholder date of birth, and policy number). This is required so IMG can determine who should cover what costs.</li> <li>• wanted to enroll in the AmeriCorps VISTA Health Benefit Plan before 2019 had to provide their ECN to demonstrate eligibility.</li> <li>• want IMG to pay a medical expense must provide their medical bills and an explanation of the health issue that led to the service. Those bills may include the name and business contact information of one or more people who represent the healthcare provider.</li> <li>• want IMG to pay a medical expense which indicates that they may have been involved in an accident must provide information about the accident</li> </ul> |

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|  | <p>(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.</p> <ul style="list-style-type: none"> <li>• 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).</li> <li>• contact customer service for assistance may have notes from their communications added to their file in AHB.</li> </ul> <p>Some of this information is collected through forms available on IMG’s website (<a href="#">VISTA forms</a>, <a href="#">NCCC and FEMA Corps forms</a>).</p> |
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**9- COLLECTIONS OF PII INTO THE SYSTEM**

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| <b>9-1</b> | <p><b>Describe for each source of PII in the system:</b></p> <ol style="list-style-type: none"> <li><b>a. The source.</b></li> <li><b>b. What PII comes from that source.</b></li> <li><b>c. How the PII enters the system.</b></li> </ol>  |
|            | <p>Every workday, CNCS’s eSPAN system electronically sends AHB an encrypted 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.</p> <p>AHB collects some PII about a Member from the Member, such as their enrollment documents (e.g., name, contact information, other insurance coverage) and banking information. Other PII about the Member can be provided by the Member or a third party at the Member’s request. For example, Members 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.</p> <p>AHB collects some PII from a 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).</p> |
| <b>9-2</b> | <p><b>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>.</b></p> <p>Members can communicate with AHB through mail, fax, the website, and email. IMG uses several methods to notify Members about the use of their PII.</p> <p>The enrollment forms ask if IMG may request information from healthcare organizations on their behalf.</p> <p>All IMG forms clearly state the purpose of the form and what PII the Member is expected to provide, which should limit the chance of a Member providing unnecessary PII.</p>   |

If Members choose to use the IMG website:

- The login page states that Members who use the website are providing their PII to IMG and that 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:

*We are required by the Privacy Act of 1974 (5 U.S.C. 552a) to tell you what personal information we collect and how it will be used: **Authorities** – The personal information is requested pursuant to 42 U.S.C. 4955, Support services; 42 U.S.C. 12618, Authorized benefits for Corps members; and 45 CFR § 2556.320 - What benefits may a VISTA receive during VISTA service? **Purposes** – It is requested to manage and evaluate the health benefits programs offered to VISTA, NCCC, and FEMA Corps Members. **Routine Uses** – Routine uses of this information may include disclosure to (1) health care providers and insurance companies to provide care and coordinate payment, (2) contractors to assist with providing the health care benefit, and (3) federal, state, or local agencies pursuant to lawfully authorized requests. **Effects of Nondisclosure** – This request is voluntary, but not providing the information will likely affect your ability to receive your health care benefits. **Additional Information** – The applicable system of records notice is [SORN Notice –pending publication)].*

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 private 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 sending the password in a separate email.*

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**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 Not Applicable.**

Eligibility information is collected from CNCS because it is updated daily and is the official record of whether a Member is eligible for a health benefit plan. All Members are informed about IMG's services when they join VISTA, NCCC, or FEMA Corps.

Some PII comes from a third party when requested by a Member who would only serve as an intermediary. For example, a Member can authorize a provider to

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|            | <p>submit reimbursement forms directly to IMG instead of sending them to the Member who would submit them to IMG.</p> <p>Some PII about a third party is provided by the 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.</p>   |
| <b>9-4</b> | <p><b>If any collections of PII 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>.</b></p> <p>Not applicable.</p>   |
| <b>9-5</b> | <p><b>If any collections of PII into the system are subject to an agreement, describe those agreements. If no agreements are relevant, write <u>Not Applicable</u>.</b></p> <p>IMG's contract with CNCS states that (1) IMG and any subcontractors will protect any PII collected from the Members, (2) CNCS owns all Member PII maintained by IMG and its subcontractors, and (3) IMG and its subcontractors are obligated to transfer that PII to CNCS if this contract ends.</p> |

## 10- SYSTEM ACCESS

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| <b>10-1</b> | <p><b>Separately describe each category of individuals who can access the system along with:</b></p> <ol style="list-style-type: none"> <li><b>What PII they can access (all or what subset).</b></li> <li><b>Why they need that level of access.</b></li> <li><b>How they would request and receive that access.</b></li> <li><b>How their access is reduced or eliminated when no longer necessary.</b></li> </ol>   |
|             | <p>Apart from Members accessing their own accounts, the only people with direct access to AHB are the approximately 55 IMG staff and contractors responsible for managing the software and services (e.g., IT Systems Administrators, medical staff, and claims processors). They can all view and edit a Member's records because they need that access to complete their jobs. IMG has written procedures, security and privacy controls, and responsibilities regarding who should have direct access to AHB and the PII it contains.</p> |

## 11- PII SHARING

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| <b>11-1</b> | <p><b>Separately describe each entity that receives PII from the system and:</b></p> <ol style="list-style-type: none"> <li><b>What PII is shared.</b></li> <li><b>Why PII is shared.</b></li> <li><b>How the PII is shared (what means/medium).</b></li> <li><b>The privacy controls to protect the PII while in transit.</b></li> <li><b>The privacy controls to protect the PII once received.</b></li> <li><b>Any agreements controlling that PII.</b></li> </ol> <p><b>If PII is not shared outside the system, write <u>Not Applicable</u>.</b></p> |
|             | <p>PII from AHB may be shared with authorized CNCS and IMG staff, contractors, and subcontractors. Every workday, IMG receives limited information from eSPAN and provides it through a secure transfer to the following subcontractors:</p>  |

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|  | <ul style="list-style-type: none"> <li>• UniversalRx because IMG has a contract with this company to manage the pharmacy benefits. UniversalRx uses the extract, with information from Members about their prescriptions, to confirm that prescriptions are covered and process a reimbursement.</li> <li>• Equian because IMG has a contract with this company to manage the provider benefits. Equian uses the extract, with information from Members about their medical visits, to confirm that visits are covered and process a reimbursement.</li> <li>• Teladoc because IMG has a contract with this company to provide phone-based medical care to its Members. The vendor merges the extract with records on the care provided to that Member during their calls.</li> </ul> <p>All other disclosures would require the Member’s express consent, or a legal requirement established by the Federal government.</p> |
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**12- PRIVACY ACT REQUIREMENTS**

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| <b>12-1</b> | <p><b>If the system creates one or more systems of records under the Privacy Act of 1974:</b></p> <ul style="list-style-type: none"> <li>a. Describe the retrieval that creates each system of records.</li> <li>b. State which authorities authorize each system of records.</li> <li>c. State which system of records notices (SORN) applies to each system of records.</li> </ul> <p><b>If the system does not create a system of records, write Not Applicable.</b></p>  |
|             | <p>AHB may retrieve a Member’s 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 Member in order to track their information across AHB and any other IMG databases; the number is not used outside IMG.</p> <p>AHB does not retrieve provider representatives’ information by a personal identifier.</p> <p>A new SORN is currently being submitted for publication for this system. The above Privacy Act Statement, developed from the draft SORN, is provided to Members when they provide information that is collected and inputted into AHB.</p> |

**13- SAFEGUARDS**

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| <b>13-1</b> | <p><b>Describe the technical, physical, and administrative safeguards that protect the PII in the system.</b></p>  |
|             | <p>All electronic data is encrypted at rest and in transit using FIPS 140-2 encryption protocols. 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.</p> <p>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.</p> |

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|  | <p>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 Complete System Security Plan including policies for Access Control, Identification and Authentication and System and Communications Protection.</p> <p>Each IMG employee and contractor who works on AHB is required to sign a confidentiality or non-disclosure agreement and completes 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 customer data of all types, refresh their awareness of the importance of this secure handling of data and update on any new regulations or process change. In addition, each department is required to conduct role specific training for each of their associates on how to handle data for their job.</p> <p>IMG maintains that it has a process in place to report breaches to CNCS within a set period of time if there is ever an unauthorized intrusion on the system.</p> |
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**14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL**

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| <b>14-1</b> | <p><b>Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete.</b></p> <p>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, an online chat service, or an online messaging service.</p> <p>Every weekday, IMG receives updated PII about each Member’s eligibility and their physical addresses.</p> <p>AHB has been developed and tested to help IMG manage the amount of PII that is required to manage the three programs.</p>          |
| <b>14-2</b> | <p><b>Describe how an individual could view, correct, update, or ask to amend their PII.</b></p> <p>Members can view claims, benefits, and other documents by logging onto the website or requesting them from IMG. They are directed to update 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 portal account.</p> |
| <b>14-3</b> | <p><b>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.</b></p> <p>Members can decide not to enroll which means that the only PII about them in the system would be the PII sent from CNCS 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.</p>  |



## 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.**

All PII is required to be destroyed in accordance to the NARA approved retention schedule. It says to destroy the PII seven years after the last time it was accessed; paper is shredded and recycled while electronic media is degaussed and destroyed.

## 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 Not Applicable.**

Not Applicable.

## 17- WEBSITES

**17-1 If the system includes a website which is available to individuals apart from CNCS personnel and contractors, discuss how it meets all CNCS and Federal privacy requirements. If the system does not include a website, write Not Applicable.**

AHB uses a small number of tier 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 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 LivePerson cookie that identifies the computer when someone uses the live chat feature and locates their prior chat history is deleted no later than 1 year after the last visit.

The other cookies mentioned in the IMG's 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 Not Applicable.

Not Applicable.