



Privacy Impact Assessment (PIA)  
for the

# National Disaster Medical System Medical Professional Credentials System of Records

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## Abstract

The National Disaster Medical System Medical Professional Credentials (NDMS) provides health services, health-related social services, other appropriate human services, and appropriate auxiliary services including mortuary and veterinary medical services in times of national emergency, and providers respond to the needs of victims of a public health emergency or other public emergency, as defined in 42 USC §§ 300hh-11(b)(3)(A). The NDMS program collects and maintains personally identifiable information in order to hire and retain qualified medical professionals and other professionals that can be activated and deployed in times of emergency. Although it is a coordinated program,<sup>1</sup> it is managed by the Federal Emergency Management Agency's (FEMA) Response Division. (FEMA is a component agency of the Department of Homeland Security (DHS).) When the program providers are activated they are employed as federal employees by DHS/FEMA.

## Introduction

The National Disaster Medical System Medical Professional Credentials System of Records (NDMS) operates pursuant to 42 USC §§300hh-11(b) (2002). Although it is a coordinated program,<sup>2</sup> it is managed by the Federal Emergency Management Agency's (FEMA) Response Division. (FEMA is a component agency of the Department of Homeland Security (DHS).) NDMS provides health services, health-related social services, other appropriate human services, and appropriate auxiliary services including mortuary and veterinary medical services in times of national emergency. The NDMS providers respond to the needs of victims of a public health emergency or other public emergency, as defined in 42 USC §§ 300hh-11(b)(3)(A). When the program providers are activated they are employed as federal employees by DHS/FEMA.

The NDMS program collects and maintains personally identifiable information, as defined in the Privacy Act of 1974 (5 U.S.C. 552a), in order to hire and retain qualified medical professionals and other professionals that can be activated and deployed in times of emergency. This information is also regularly updated to ensure currency of qualifications. NDMS also collects information on qualified medical professionals who are system members of the National Urban Search and Rescue Response System (US&R), which is also managed by FEMA's Response Division. The NDMS medical professionals are primarily intermittent federal employees who are assigned to Disaster Medical Assistance Teams (DMATs) or other specialty teams that are located in various locations throughout the United States.

Potential NDMS and US&R team members apply, either on-line or manually, by completing the Optional Form OF-612 or other standard formats for applications for federal

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<sup>1</sup> NDMS is a coordinated effort by the Department of Health and Human Services (HHS), the Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA), the Department of Defense (DoD), and the Department of Veteran Affairs (VA).

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employment or status<sup>3</sup> and by submitting them to FEMA's Office of Human Resources (HR). HR reviews the package and utilizes the qualifying criteria from the Office of Personnel Management series that applies to the prospective health care provider to determine whether the individual is a qualified health care provider. The information collected such as the applicant's medical qualification is used to credential the applicant in accordance with the industry standard, which requires primary source verification (PSV) on education, licensure and board certifications.

NDMS maintains and password protects information from applications and from licensing boards and educational and training institutions according to the PSV process.

The medical credential information collected is important because it will be used by NDMS to determine the professional qualifications of the medical provider in relation to the specific needs and tasks assigned to NDMS. The location, specialty of the provider, and other identifying factors will be used to assign the medical provider to positions and locations most suitable to the needs of NDMS/FEMA and the applicants/employees. This collected information serves as the basis by which hiring officials can certify these professionals' basic qualifications for the jobs to which they are assigned, as well as to determine the clinical privileges designated to specific team members. The verification of credentials ensures that the medical treatment provided is done by qualified, licensed, professionals, and provides DHS the ability to utilize these employees in the most effective way possible. Similar information on US&R medical professionals is included in the data base. Although NDMS collects extensive credential information to credential individuals, DHS/FEMA will only share the minimum information necessary to allow Federal, state, or local agencies to verify that the personnel who are deployed are qualified with proper credentials and meet all necessary standards for the job(s) they are to perform.

## Section 1.0 Information collected and maintained

### 1.1 What information is to be collected?

FEMA will collect medical credential and qualification information from all health care professionals as well as allied health members<sup>4</sup> who apply to the NDMS and US&R.

Information in this system of credentialing records will be derived from the electronically or manually filed OF 612 or other standard application format. NDMS will require applicants to submit actual copies of diplomas, transcripts, licenses, or certificates. In some cases, certified copies must be sent from the institution or certifying agency. A paper and/or electronic scanned copy may be made of these documents as verification of any necessary credentialing criteria. Most NDMS application forms require the collection and maintenance of the following personally

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<sup>3</sup> NDMS has developed electronic data entry forms that can also be used for credentialing, and the forms have been submitted to the Office of Management and Budget for approval.

<sup>4</sup> **Allied health professionals** are those clinical healthcare professionals distinct from the medical, dental and nursing profession. As the name implies, they are all allies in the healthcare team, working together to make the healthcare system function, such as medical technicians, nurses aides, dental assistants, etc.



identifiable information:

- Name (Last, First, Middle), including any other names known by and when
- Social Security Number:<sup>5</sup>
- Position Being Applied For
- Home Address, including street address, city, state, and zip code
- Home Telephone
- Cell Phone if applicable
- Fax number if applicable
- Email address if applicable
- Current Employer Name (if applicable) or place of employment
- Primary Office Address, including street address, city, state and zip code
- Primary Office Telephone, Fax, or Email
- Place of Birth, City, State, Country other than United States.
- Citizenship, and if not citizen, Status and Visa Number
- Gender
- Military Service History if applicable and copy of DD 214
- Other Employment History including name, location, dates, and contact information
- Other health care facility affiliations
- Education Background, including names and dates for all certificates and diplomas
- Specialty(ies), including all certificates or other documentation
- If certifying Board membership, Board name and address, and most recent date
- Certification, date of initial certification and most recent certification
- Examinations passed
- Licenses – include for all states
- Drug Enforcement Agency Number
- References including name, address, phone numbers and email addresses
- Other information such as criminal history, medical malpractice action, or other disciplinary action taken against the applicant, if applicable. (This includes statements from all malpractice insurance carriers, dating back ten years.)

In addition to this information, the system will maintain whether or not FEMA decided to hire the individual.

## 1.2 From whom is Information collected?

All medical professionals and allied health members seeking employment with NDMS are required to submit medical credentialing information, including current medical professional NDMS employees and medical team members of the US & R. Information for the purpose of credentialing is also collected from state licensing boards, educational institutions and

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<sup>5</sup> Providing personal information including Social Security Numbers is voluntary for applicants to these positions; however, failure to provide this information could prevent the application from being processed.



former/current employers. NDMS employees are responsible for providing FEMA with all updated information necessary to keep their status current. Types of medical professionals and allied health members who seek employment or are currently employed by NDMS include, but are not limited to:

- Doctors ( or physicians)
- Physicians Assistants
- Dentists
- Dental Assistants and Hygienists
- Pharmacists
- Pharmacy Assistants
- Anesthesiologists
- Nurses- Registered and Licensed Vocational or Licensed Practical Nurses
- Nurses Aides
- Dietitians
- Psychologists
- Paramedics and Emergency Medical Technicians
- Social Workers
- Therapists
- Radiology Techs
- Respiratory Therapists
- Medical Technologists
- Counselors
- Opticians
- Veterinarians

### 1.3 Why is the information being collected?

Information is collected on potential and current NDMS medical professional employees and allied health members as well as US&R medical professional system members to assess each individual's qualifications and credentials to administer health care in response to public disasters or other covered events. The collection and maintenance of medical credential information on NDMS medical and US&R professionals is collected for three primary purposes: (1) hiring decisions (recruitment and retention); (2) certification/recertification; and (3) privileges<sup>6</sup>.

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<sup>6</sup> Privileges are granted by an institution based on credentials, skill currency, skill proficiency, and resources available within the organization. For example, if an individual was trained in a skill ten years ago but has not practiced that skill recently, the institution would not allow that skill to be performed within its facility without demonstrated refresher training. Privileges are used to ensure providers and institutions are providing quality care.



### **1.4 What specific legal authorities/arrangements/agreements define the collection of information?**

The collection of information is based on the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121-5206 and the Homeland Security Act of 2002, Public L. No. 107-296(2002), 6 U.S.C. 101, et.seq., and the Health Care Quality Improvement Act of 1986, 42 USC §11101, et.seq. The NDMS Statute, 42 USC. §§ 300hh-11, is the authority that places NDMS within DHS/FEMA. The National Response Plan, Emergency Support Function #8, "Public Health and Medical Services Annex" also delineates NDMS responsibilities for providing health care and coordinating with the Department of Defense (DoD), Department of Veteran Affairs (VA) and Department of Health and Human Services (HHS) in an emergency requiring implementation of the National Response Plan.

### **1.5 Privacy Impact Analysis**

FEMA reviewed the existing paper based process while developing the electronic application process. By examining the types of information required to complete the assessment of individual's qualifications and credentials, FEMA determined that it was using the minimum amount of personal information necessary to provide adequate credentialing information. The update in technology and the use of an online form should improve the accuracy of the information and minimize lost files. The electronic process of collecting and verifying information will also be streamlined while accuracy will be improved. For example, when checking the National Practitioner Databank (NPDB) for any negative information, NDMS will provide to the NPDB the individual's name, social security number, as well as any aliases, just as they appear on a person's medical license. This is the minimum information necessary to receive an accurate response as to whether an individual is in the NPDB. If NDMS were to deny employment/continued employment based on any derogatory information collected in this credential verification process, the person would be notified of the decision and why, and would then be able to correct the information through the procedures described in Sections 7.2 and 7.3 of this PIA.

## **Section 2.0 Uses of the system and the information**

### **2.1 Describe the uses of the information.**

The NDMS Medical Professional Credentials Systems of Records will be used, as stated in Section 1.3, for

1. Hiring Decisions
2. Certification/Recertification
3. Privileges
4. Deployment in times of emergency



## **2.2 Does the system analyze data to assist users in identifying previously unknown areas of note, concern, or pattern (sometimes referred to as data mining)?**

The system analyzes data to assess demographic needs, trends, and requirements as well as to identify shortages in particular medical disciplines. The information contained in the system assists with personnel accounting and establishes a means by which NDMS and US&R can identify its staff with specialized credentials and availability. This system helps NDMS and US&R to activate and deploy their medical professionals in the most efficient and expeditious manner possible in the event of a national emergency or events of national significance.

## **2.3 How will the information collected from individuals or derived from the system be checked for accuracy?**

The medical professional submitting the application must sign and verify that the information he or she has provided is true and correct to the best of the submitter's knowledge. The applicant submitting the information must sign an attestation letter verifying that all information collected in the application is true. Credential certification will also be verified through transcripts from educational institutions and certificates from State licensing boards if applicable.

## **2.4 Privacy Impact Analysis**

FEMA has limited the amount and type of personal information to be used in the NDMS medical credentialing process. FEMA has mandatory privacy and security training for anyone having access to its computer system. Only authorized users of the system may gain access to the information for authorized uses. If an individual is found to be misusing the information, appropriate disciplinary actions will be taken.

## **Section 3.0 Retention**

### **3.1 What is the retention period for the data in the system?**

Records in this system will be retained in accordance with a schedule approved by the National Archives and Records Administration (NARA) for personnel records. Employee files are retained for a period of 65 years after the employee's date of separation from the Agency, based on NARA General Records Schedule (GRS) Sec. 1.1b. Application information for individuals that are not hired is destroyed two years from date of application, based on NARA GRS Sec. 1, Item.15.



### **3.2 Has the retention schedule been approved by the National Archives and Records Administration (NARA)?**

Yes. See answer to Section 3.1 above.

### **3.3 Privacy Impact Analysis**

Retention is required by NARA for the approved period because these medical professionals are considered federal employees for the period of time they participate in the NDMS system, and the retention period is consistent for federal employee records.

## **Section 4.0 Internal Sharing and Disclosure**

### **4.1 With which internal organizations is the information shared?**

- FEMA Office of Human Resources
- FEMA Information Technology Services Division
- FEMA Office of the Chief Counsel
- FEMA Office of Equal Rights
- FEMA Response Division, Operations Branch, Urban Search and Rescue Office
- Any Department of Homeland Security (DHS) Office that might provide guidance to any of the above listed FEMA offices – Information shared will be only that information necessary for the DHS component, with a need-to-know, to address each specific need as it arises, in accordance with the applicable provisions of the Privacy Act, 5 USC §552a.

### **4.2 For each organization, what information is shared and for what purpose?**

- FEMA Office of Human Resources for hiring and any other personnel issues that may arise, including grade and pay level assignments, time of service for benefit determination.
- FEMA Information Technology Division and NDMS contract personnel for maintaining and backing up all files that are created and stored in an electronic format.
- FEMA Office of the Chief Counsel for ensuring compliance with necessary laws and legal responsibilities. Credential information will only be shared with the Office of the Chief Counsel when the NDMS Chief determines it to be necessary and only on a need-to-know basis.
- FEMA Office of Equal Rights for handling employment disputes, particularly if one of the NDMS medical professionals feels he or she has been discriminated against through failure to deploy or any other action perceived as harassment or discrimination by the employer.
- FEMA, Response Division, Operations Section, US & R, since their medical component may utilize NDMS credentialing data for verifying information about their physicians and paramedics so that they may carry out their mission and perform necessary services for their medical emergency assistance functions.
- DHS Components to provide guidance as specified in Section 4.1 above.





### 4.3 How is the information transmitted or disclosed?

Applicants have an on line system where their information related to medical credentialing is collected. The information disclosed by the applicant is available and disclosed to the NDMS Credentials Program Manager and internal NDMS personnel for the purpose of credential verification and deployability. Internal DHS / FEMA organizational entities can access credential information only through a request to the Chief of NDMS or his designee. The information shared will only be the results of the credentialing process and not the aggregated or collected information on each individual provider. The final result of the credentialing process may be transmitted electronically or manually using paper format.

### 4.4 Privacy Impact Analysis

FEMA has limited the number of types of individuals with access to the personal information in NDMS. Information is shared within DHS only as specified in this section on a need-to-know basis and only for purposes of credentialing and for oversight of the program and is not shared with any other DHS component without a need for the information.

## Section 5.0 External Sharing and Disclosure

### 5.1 With which external organizations is the information shared?

- Other Federal agencies that support NDMS when its teams are activated for incident response operations:
  - U.S. Department of Health and Human Services (HHS)
  - U.S. Department of Defense (DoD)
  - U.S. Department of Veteran Affairs (VA)
- State, Local and Tribal Medical facilities where NDMS medical professionals may be deployed

NOTE: See Sec. 5.2 below for explanation of information shared with these external organizations.

### 5.2 What information is shared and for what purpose?

An individual's medical credentials are externally shared as stated in Section 5.1 above for these stated reasons:

#### **Health and Human Services (HHS)**

HHS may direct NDMS assets in times of national emergencies. NDMS provides HHS with a list of available medical professional personnel and their positions/titles—thus verifying to HHS, and other agencies where these medical professionals will work and that these individuals are qualified and certified to do the jobs for which they are employed. (See also Sec. 1.4) When



NDMS medical professionals are deployed they become the medical assets for Emergency Support Function #8 (Public Health and Medical Services Annex) facilities, under the National Response Plan. HHS determines the specific assignments and privileges for the NDMS staff in their deployed locations.

HHS also provides the services of the National Practitioner Databank (NPDB) and FEMA/NDMS shares information with NPDB as detailed in the following explanation:

**NPDB: The National Practitioner Data Bank (NPDB):**

The NPDB is an affiliated resource within the Department of Health and Human Services (HHS) that monitors medical professional compliance, misconduct, and works in conjunction with licensing and State medical boards. Any information contained within NPDB on NDMS and US&R medical professionals is not provided to NPDB by NDMS or any other FEMA entity in the credentialing process, but by State boards or other credentialing bodies and records any negative or derogatory information about licensed, certified, and credentialed medical professionals throughout the United States. (It is possible that FEMA/NDMS may need to submit information to the NPDB in accordance with the Health Care Quality Improvement Act of 1986, 42 USC §11101, et.seq., but this would not be part of the credentialing process.) NDMS queries NPDB at the time of hiring and on an ongoing basis to determine if there is any negative or derogatory information on applicants and/or employees of NDMS. NDMS sends the individual's name, social security number, as well as any aliases, just as they appear on a person's medical license. This ensures that NDMS receives an accurate response back from NPDB and matches the information correctly. If the applicant/employee is denied employment/continued employment due to negative information obtained from the NPDB, and the individual feels the information contained within the NPDB is incorrect, they can contact HHS directly.

**Other agencies**

Also based on Emergency Support Function #8, NDMS would share information with the Department of Defense, Department of Veteran Affairs, as well as State, local and tribal medical facilities to where NDMS medical personnel may be deployed.

When a disaster is declared, these outside agencies inform NDMS as to their needs for medical personnel. NDMS then provides the agencies with names/rosters of qualified medical personnel (based on the credentials discussed herein and as described above in the sharing process with HHS). Then the agencies determine if, in fact, these identified medical personnel are needed and where. NDMS then responds to these disasters by activating and deploying the identified medical staff and, based on the credentials that NDMS has collected and verified, ascertains to the deploying agency(ies) that the individual(s) are qualified.

### 5.3 How is the information transmitted or disclosed?

Electronic copy: These copies will consist of electronic versions of hardcopy reports and/or delimited extracts of data that has been entered into the medical credential database. The



electronic copies, both data and reports, will be encrypted and transmitted via email or physical media to needed locations so NDMS medical staff may be deployable as quickly as possible in a disaster situation. The receiving party will request the decryption key from authorized NDMS personnel and be given the key subject to verification of identity. Best efforts will be made to maintain the appropriate levels of security throughout the process. If necessary, credential data may need to be hand-carried to a disaster sight or sent by U.S. Postal Service (certified mail, return receipt requested) or other secure method of delivery.

Hardcopy: FEMA does not share personally identifying information with external agencies other than as outlined in our System of Records Notice as listed above under Section 5.1. Once FEMA verifies that an external agency has authorized access to the personally identifiable information that is covered in this system of records, this information is transmitted through government secured fax and electronic communication lines, with a statement identifying the information as "For Official Use Only." It is transmitted only for the specific purpose intended, as stated above. It may be mailed using first class mail through the U.S. Postal Service or other federally contracted delivery providers. It may also be hand-carried, by authorized staff only, and given only to the outside agency staff with an authorized need-to-know.

#### **5.4 Is a Memorandum of Understanding (MOU), contract, or any agreement in place with any external organizations with whom information is shared, and does the agreement reflect the scope of the information currently shared?**

No MOU's currently exist between FEMA/NDMS and other federal agencies that involve medical credential information, because they are already covered under the routine uses described in the System of Records Notice (SORN) for this information.

#### **5.5 How is the shared information secured by the recipient?**

The responsibility for information security will rest with the recipient of the information, but NDMS will notify the recipient that the information although limited remains sensitive and should be handled accordingly.

#### **5.6 What type of training is required for users from agencies outside DHS prior to receiving access to the information?**

A notice will accompany the information that informs the recipient that the information comes from a Privacy Act system of records and its handling is governed by the Privacy Act of 1974, 5 U.S.C. 552a.



### 5.7 Privacy Impact Analysis

FEMA limits the sharing of personal information collected as part of the NDMS medical credentialing process to external agencies on an individual basis. FEMA will review each application and employee record and determine whether or not it meets the standards for sharing set out by the System Of Records Notice (SORN). It does not provide electronic access to the information other than as specified in Section 5.2 above, and thus controls the information being provided.

## Section 6.0 Notice

### 6.1 Was notice provided to the individual prior to collection of information? If yes, please provide a copy of the notice as an appendix. A notice may include a posted privacy policy, a Privacy Act notice on forms, or a system of records notice published in the Federal Register Notice. If notice was not provided, why not?

Yes. A SORN will be published in the Federal Register on October 13, 2006. In addition, a Privacy Act notice is given to the individual in both the hardcopy paper version of the application form as well as on the first screen that appears on the electronic application developed for NDMS.

The link to the FEMA Website Privacy Policy is <http://www.fema.gov/help/privacy.shtm>. The following privacy policy will be used with the electronic NDMS application for medical personnel employment:

“FEMA is authorized to collect information to process applications and re-certifications for employment with NDMS. Providing the requested information, including the applicant’s/employee’s Social Security Number, is voluntary, but failure to provide the information may result in a delay or denial in processing an application.”

### 6.2 Do individuals have an opportunity and/or right to decline to provide information?

Yes, applying to work as a medical professional with NDMS or allied health member or US&R is a voluntary process. Individuals seeking employment or updated credentialing are informed that submission of their personally identifying information is voluntary; however, they are informed that the failure to submit the necessary information may result in denial of employment or denial of continued employment for failure to remain certified, or maintain up-to-date information to retain medical privileges.



### **6.3 Do individuals have the right to consent to particular uses of the information, and if so, how does the individual exercise the right?**

Individuals providing the information to NDMS for new and/or continued employment are advised that information will be shared by NDMS with other Federal Agencies such as HHS, the VA, DoD or State/local first responder entities that may require the professional medical services of activated NDMS medical staff members. This information will be limited to information which will allow the health care provider to render medical care.

### **6.4 Privacy Impact Analysis**

Notice is provided at the point of collection on the NDMS website with a link to the NDMS Privacy Policy, and is also on the instructions for the actual forms (OF 612), and the NDMS online and hardcopy credentialing application/verification forms. Notice will be published in the Federal Register with ample time for the public to comment on this collection of records. This PIA accompanied by appropriate information will also be posted on the DHS website as stated in the Federal Register Notice. This will enable the public to address their additional comments, questions and concerns to the appropriate federal official.

## **Section 7.0 Individual Access, Redress and Correction**

### **7.1 What are the procedures which allow individuals to gain access to their own information?**

The procedures for individuals to gain access to their own information are listed both in FEMA's and the DHS's Privacy Act regulations, 44 CFR Part 6 and 6 CFR Part 5. Requests for Privacy Act protected information must be made in writing, and clearly marked as a "Privacy Act Request." The name of the requester, the nature of the record sought, and the required verification of identity must be clearly indicated. Requests should be sent to: Privacy Act Officer, DHS/FEMA, Office of General Counsel (GL), Room 840, 500 C Street, SW, Washington DC 20472.

### **7.2 What are the procedures for correcting erroneous information?**

Applicants and current NDMS and US&R medical employees are asked to provide accurate information. The online form has a final review screen with edit buttons for correcting errors prior to submission. If an application or certification record update is submitted with erroneous information, then the applicant initiates corrective action through NDMS/FEMA. This could involve the resubmission of a new application or enabling the correction of the current record.

Individual applicants and employees will have access only to their own personal records and are able to correct erroneous information contained in their files.

If the individual or the employer finds an error after the record is submitted, then he/she



is allowed to resubmit the request with accurate information. Typically, that is handled by phone or written correspondence. In addition, an individual can correct erroneous information in accordance with both DHS's and FEMA's Privacy Act regulations, as identified in 7.1. This also applies to any derogatory information acquired through the National Practitioner Databank (NPDB), however to address incorrect information from NPDB, contact must be made with the U.S. Department of Health and Human Services directly.

### **7.3 How are individuals notified of the procedures for correcting their information?**

Information alerting applicants and employees as to their right to correct any personal information contained within their own files is contained within the on-line application for credentialing, as well as on the OF 612. Furthermore, periodic assessment for re-licensure and re-certification assures that individuals have the opportunity to periodically review and correct information contained in their files.

### **7.4 If no redress is provided, are alternatives available?**

Redress is provided, so alternatives are not applicable.

### **7.5 Privacy Impact Analysis**

Information that NDMS collects on all medical applicants and employees collected through this Medical Professional Credential System of Records will be accessible to each employee/applicants. Each individual will be given access to their own personnel/records in accordance with provisions of the Privacy Act, 5 USC § 552a, and allowed to correct incorrect information as described in Section 7.2 above of this PIA.

## **Section 8.0 Technical Access and Security**

### **8.1 Which user group(s) will have access to the system? (For example, program managers, IT specialists, and analysts will have general access to the system and registered users from the public will have limited access.)**

The user groups that will access the credentialing information include individual applicants, existing NDMS/US&R employees that need to keep their medical credentials current, as well as NDMS and US&R management that are tasked with ensuring a qualified workforce. Other user groups are federal and contract employees who are responsible for the credentialing process as well as FEMA personnel who need the information to the extent possible to perform their official roles. Individual applicants applying for NDMS/US&R do so through the closest NDMS/US&R team and thus will provide the credential information to that organizations command staff who will enter it into the system using encrypted access.



A primary user group will be the authorized medical credentialing entity. Information will be shared with the credentialing entity solely for credential verification purposes. This entity will be a federal or federally contracted commercial entity who has been tasked with determining whether information provided to NDMS by medical applicants and employees is accurate and current. While this entity may set up and enter information from the paper and/or electronic applications into a database, the database will be owned and controlled by FEMA/NDMS. This potential contractor will also verify all licensures, certificates and diplomas to meet all industry standards for the position(s) for which the applicants and employees are hired. Any contract entered into will ensure that individuals having access to any Privacy Information will receive Privacy Training.

Employees of FEMA's NDMS authorize FEMA information technology (IT) federal employees, contractors, and credential personnel have access to medical credential records in this system only to the extent necessary to perform their official duties. Each authorized data processor will have limited access only to that information pertinent to his/her function. Authorized IT contractors who handle the operations and maintenance of the system will have limited access to the system to support the trouble shooting of technical system issues encountered on a day-to-day basis. FEMA managers and some IT managers will have complete access to the system in order to ensure that the NDMS medical credential records are maintained in accordance with applicable regulations.

### **8.2 Will contractors to DHS have access to the system? If so, please submit a copy of the contract describing their role to the Privacy Office with this PIA.**

Yes. Limited access is described in Section 8.1 above only for contract personnel working on Information Technology and computer support as well as for the credentialing process itself.

### **8.3 Does the system use "roles" to assign privileges to users of the system?**

Yes. FEMA user access is managed via role-based access control for official use that includes authorized FEMA employees and contractors. The user's access into the system is limited only to the extent necessary based upon the user's official role in the NDMS. Access to personally identifying information is granted only to the extent that it is necessary for a user to perform his or her official role in NDMS management.

### **8.4 What procedures are in place to determine which users may access the system and are they documented?**

A detailed description of the NDMS technical and management controls regarding identification and authentication, logical access controls, and public access controls is documented as part of the IT Certification and Accreditation Process. Such security documents are not available for broad review for security reasons. Access to data is controlled through use of a unique user ID



and password combination. Strong passwords following Department of Homeland Security (DHS) standards are required and ensured by system and application controls. User passwords must be changed on a regular basis. Additionally, secure sockets layer (SSL) encryption is used to protect the transfer of data. The data is hosted in a secure infrastructure with servers protected by firewalls and security monitoring software along with Tier 1 physical security. Management controls such as the monitoring of audit logs, management of vulnerabilities, and escalation for any unauthorized data use are in place. Per FEMA's procedure, an agency representative from one of the agencies listed in Section 5.1 can request access rights by submitting a request to the applicable Regional Management Center (contractors to FEMA). Based on information provided via a verifiable means of communication (i.e., e-mail), the Regional Management Center employees with concurrence from the Chief of NDMS may approve access requests and submit the access request to the FEMA Help Desk to grant access. All access to data by members of other agencies is limited and defined by the user's need and use of the data.

### **8.5 How are the actual assignments of roles and rules verified according to established security and auditing procedures?**

Roles are granted by the Information System contractors supporting the NDMS system. The NDMS system also houses the information collected to verify the credentials of medical practitioners. Periodically, a report is generated which lists authorized users and their current roles. This report is used by the Chief of NDMS, to review current system access.

### **8.6 What auditing measures and technical safeguards are in place to prevent misuse of data?**

The following controls are in place to prevent misuse:

- The NDMS medical credential database is authorized to operate under the DHS Office of Information Security certification and accreditation process. This accreditation occurs a minimum every three years. This requirement ensures that the appropriate management, technical, and operational controls are in place to safeguard sensitive agency information.
- Individuals applying for employment as a medical professional within NDMS will have no access to the NDMS medical credential database via the Internet. Applicants will be issued a temporary password granting them restricted access to the credential submission web interface, thereby giving them access to only their credential data.
- Current employees will have limited access to their own information that they have submitted via the Internet, and, to the status of their own information (e.g. board certification, state issued licenses, etc.).
- The NDMS medical credential database has role based security features that ensure that the logon ID is mapped only to that individual's data, and, that person will have access only to his or her own credential information after FEMA assigns them a properly authenticated logon ID and password.





- Activity logs (audit trails) are enabled and secured on operating systems, applications, and middleware. NDMS conducts periodic reviews of all user access.
- Computer incident response procedures are established to address and escalate reported security incidents as quickly as possible.
- Problem tracking procedures are established to enable users of the NDMS medical credentialing system of records to report any observed or suspected security weakness in, or threats to, systems or services and software malfunctions, so that they are addressed quickly.
- Procedures for the handling and storage of information are established to restrict access to unauthorized users.
- A "time-out" feature will drop a user's connection after an idle period. That protects against unauthorized users accessing unattended but connected computers.

### **8.7 Describe what privacy training is provided to users either generally or specifically relevant to the functionality of the program or system?**

These individuals will be registered and authenticated in accordance with National Institute of Standards and Technology Level 2 Assurance guidelines. Additionally, all FEMA employees and contractors are required to complete FEMA Office of Cyber Security annual Security Awareness Training. All contract employees are required to adhere to the Privacy Act/Confidentiality clauses as per terms of their contracts with FEMA.

### **8.8 Is the data secured in accordance with FISMA requirements? If yes, when was Certification & Accreditation last completed?**

The NDMS system is authorized to operate through the DHS Office of CyberSecurity Certification and Accreditation process. The authorization to operate was signed on September 15, 2006.

### **8.9 Privacy Impact Analysis:**

FEMA has instituted strong security controls to ensure that the online collection of NDMS credentialing information is protected throughout the process. This includes both extensive access controls, audit trails, and encryption.

## **Section 9.0 Technology**

### **9.1 Was the system built from the ground up or purchased and installed?**

The NDMS database and the medical credentialing system were built from the ground up to support the mission of NDMS. The information collected on the database and the medical credentialing



application forms have been designed and developed by NDMS personnel to ensure that the information collected supports and achieves the tasks assigned to NDMS. The medical credentialing application software is a “stand alone” and can be installed as a component of a more comprehensive system such as the NDMS database.

## **9.2 Describe how data integrity, privacy, and security were analyzed as part of the decisions made for your system.**

Data integrity, privacy and security were analyzed based on the information technology security measures dictated by the agency’s cyber security. The database and the medical credentialing system are designed to be protected through authentication with the use of a log on user id and password.

## **9.3 What design choices were made to enhance privacy?**

There are passwords which only the DBA and the Program credentialing manager with concurrence from the Chief of NDMS has access to distribute. Access is limited only to the individual’s personal files. The data stored on the system is protected and secured using the guidelines provided by FEMA’s office of cybersecurity.

## **Conclusion**

The NDMS medical credentialing system of record is created and maintained for the purpose of ascertaining the professional qualification and competency of health care providers. The insertion of technology through the use of an on-line application system enhances the capability of NDMS to be fully prepared to meet its assigned tasks. NDMS will be utilizing technology to communicate the results of the credentialing system with other federal agencies when necessary.

The credentialing system will become a part of the driving force of change in disaster response through its capabilities to process the medical credentials of health care professionals rapidly and accurately. The centralization of the data means that NDMS will be able to ascertain the qualifications and capabilities of its health care providers following industry standard requirements prior to a disaster as a component of preparedness and readiness. Medical credential information that is collected will be verified and entered into a database that will enable NDMS management to query select team members and produce a report showing that an individual or group of individuals maintains proper credentials and is ready for duty as needed. The ability of the credentialing system to produce rapid results securely will enable NDMS to deploy its assets in a timely manner. As a federal partner and a support entity for Emergency Support Function # 8, the sharing of information will be beneficial towards a collaborative approach in rendering medical care to those affected by disasters or public health emergencies. For the most part, the fact that employees meet the industry standard for their profession and/or meet the standard for a



particular specialty (privilege as explained in Sec. 1.3) is the only information that is shared with agencies outside the Department of Homeland Security.

FEMA/NDMS will only share information as necessary for appropriate use and to the minimum extent possible.

### Responsible Officials

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