



Privacy Impact Assessment

SYSTEM OR APPLICATION NAME: Palmetto GBA/RRB Interface

DATE: July 14, 2009

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Overview

The Railroad Retirement Board (RRB) administers the retirement /survivor benefit program under the Railroad Retirement Act (RRA). Under section 7(d) of the RRA, the RRB administers the Medicare program, i.e. Title XVIII of the Social Security Act, for persons covered by the railroad retirement system.

Palmetto GBA, the RRB's Part B Medicare carrier for individuals with Original Medicare, receives inquiries and reports from railroad retirement beneficiaries each day in the course of their regular communication with beneficiaries who file Part B Medicare claims. Beneficiaries contact Palmetto to report address changes and beneficiary deaths, and to request replacement Medicare cards. In the past, Palmetto would refer such callers to their RRB field office. This required the beneficiary to make another call. In some cases, the beneficiary would fail to make the call to the RRB to report an address change.

The Palmetto GBA application was developed to allow Palmetto customer service representatives (CSRs) to report the following directly to the RRB:

- Beneficiary address changes,
- Beneficiary dates of death, and
- Requests for replacement Medicare cards

The Palmetto GBA application is a secure application accessed through the internet by authorized Palmetto GBA customer service representatives. Access to the application is controlled by assigned user IDs and self-assigned passwords.

Palmetto CSRs first verify the identity of the caller in accordance with guidelines issued by the Centers for Medicare & Medicaid Services (CMS). The guidelines are included in the Disclosure Desk Reference for Call Centers, which is in CMS's Medicare Contractor Beneficiary and Provider Communications Manual, Chapter 2 – Beneficiary Customer Services)

<http://www.cms.hhs.gov/manuals/downloads/com109c02.pdf>. The CSR then accesses the Palmetto application through a secure link on www.rrb.gov to report an address change or a beneficiary death, or to request a replacement Medicare card. Palmetto CSRs follow procedures prescribed by the RRB to access and complete the appropriate transaction screen. Transactions entered by Palmetto CSRs are available for processing the next business day by field offices.

Section 1.0 – The Nature of the Information in the System and Its Source

We use our Palmetto GBA contractor to provide Medicare customer support services for our Beneficiary's who need to:

- Change the address
- Request a new Medicare Card
- Report the date of death for a beneficiary

In order for Palmetto GBA to process your request, the CSRs need to obtain identifying information about the beneficiary such as:

Beneficiary change of address transactions involve the collection and use of the following information from the railroad retirement beneficiary:

- Claim number with prefix,
- First name, initial and last name,
- Telephone number, and

- New address, including city, state and ZIP Code.

Requests for replacement Medicare cards involve the collection and use of the following information from the beneficiary:

- Claim number with prefix,
- Beneficiary's social security number,
- Telephone number,
- First name, initial and last name, and
- Zip Code

To report a beneficiary's date of death, the following information is collected and used:

- The beneficiary's claim number with prefix,
- The beneficiary's first name, initial and last name,
- The beneficiary's date of death,
- Contact's name (who reported the death),
- Contact's relationship to the deceased,
- Contact's e-mail address,
- Contact's address, including city, state and ZIP Code, and
- Contact's telephone number

Section 2.0 -- The Uses of the Information

We collect this information in order to provide for Medicare support services for you. Our authority to collect and use this information comes from the Railroad Retirement Act, section 7(d) ([45 U.S.C. § 231f\(d\)](#)), Title 18 of the Social Security Act (Medicare) ([42 U.S.C. § 1395](#)), RRB's Privacy regulations ([20 C.F.R. § 200.5](#)) and SSA's Privacy regulations ([20 C.F.R. § 401.](#))

Section 3.0 – Retention of Information

We base our need to retain information on what is required to provide the service for which it is collected. The National Records and Archives Administration reviews and approves our retention schedules. When the information is no longer required, we securely dispose of it.

Section 4.0 -- Internal Sharing and Disclosure of Information

Sensitive information that we store and process to provide Medicare support services is shared internally only to those authorized RRB staff members that have a valid business requirement for it. We have established security and privacy policies and procedures, awareness training programs and rules that our staff must follow when using our systems and accessing sensitive data. Our rules also cover what is required to disclose information and the penalties for improper disclosure.

Section 5.0 -- External Sharing and Disclosure of Information

We only share information as required to provide for the timely and accurate processing of Medicare support requests. Our Privacy Act Systems of Records Notices outline what information we routinely share with other agencies or organizations.

Section 6.0 – Notice

We publish our Privacy Act Systems of Records Notices both in the *Federal Register* and on our web site (http://www.rrb.gov/bis/privacy_act/SORNList.asp).

These notices explain:

- What system collects and uses the information;
- What information is collected;
- Under what routine uses we may release that information;
- How we store, retrieve, retain and safeguard that information;
- What RRB official is the manager of that system;
- The procedures to follow if you want to see or request corrections made to any information that system may have about you.

We also publish a Privacy Act Notice and a Paperwork Reduction Act Notice on any form that we use to collect personal information from you.

The Palmetto GBA system uses information that is collected and used as outlined in the Privacy Act System of Records Notices (SORN) listed here:

RRB-3...Medicare, Part B
RRB-20...Health Insurance and Supplementary Medical Insurance
Enrollment and Premium Payment System (Medicare)
RRB-22...Railroad Retirement, Survivor, and Pensioner Benefit
System

We only share that information needed to provide and manage your benefits with those RRB staff members or other organizations that we listed under our routine disclosures in our Privacy Act Systems of Records Notice on a strict need-to-know basis. We have management, operational and technical control safeguards in place to mitigate risks to information you provide us.

Section 7.0 -- Individual Access and Redress

If you wish to review or request a change to the records and benefits that we maintain on you, please contact the nearest RRB field office for assistance.

You may also file a request for information regarding your records in writing, including your full name, social security number and railroad retirement claim number (if any). Before information about any records will be released, you will be required to provide proof of identity, or authorization from the individual you are requesting records for. Send your request to Office of Programs—Director of Operations, Railroad Retirement Board, 844 Rush Street, Chicago, Illinois 60611-2092.

You may also request reconsideration of any adverse determination based on information we used in determining your eligibility or payment for claims. We include instructions on how to file a request for reconsideration in all of our letters of determination. If you are not satisfied with the results of the review, you have the right to pursue a defined appeals process, which we explain in the reconsideration decision notice.

Section 8.0 -- Technical Access and Security

Our greatest privacy risk is unauthorized access or modification of records containing sensitive information. We mitigate this risk by following Federal security and privacy guidance and directives. An independent contractor evaluated the Palmetto GBA system as part of its Certification and Accreditation process to ensure we are compliant with the appropriate security standards.

We provide security and privacy awareness training annually to all agency system users. Before granting access to the Benefit Payment Operations system, new users receive training on proper use of the system and protecting the confidentiality of the data. We also require our users to receive additional training from other Federal Agencies (Social Security Administration and Centers for Medicare and Medicaid Services) if they are accessing information that is owned by those agencies.

Before we grant or modify access to the Benefit Payment Operations system, our management reviews the request and approves it if the employee or contractor requires that level of access to perform their assigned job duties. Once approved by management, they forward the request to our network access control staff, which assigns the appropriate roles and security profile for that authorized user. We use established role based access control rules and follow the procedures outlined in our internal agency operating manual.

We use extensive technical measures in order to provide both electronic and physical defense-in-depth protection for your information. Some of our safeguards are:

- Internal policies and training addressing proper handling of sensitive information
- Limiting access to those staff members who have a business requirement to that information
- Information systems secured in accordance with Federal Law, National Institute of Standards and Technology (NIST) and other Executive Agency guidance and directives.
- Role based access controls used to control access to electronic data records and applications enforcing need to know and least privilege policies
- Transaction histories are maintained to track any changes to an individuals record
- Encryption of all data on systems that are located outside of RRB facilities, and on our notebook computers
- Encryption of all data that transits to or from the RRB network
- Secure disposal of electronic media when it is no longer required
- Logging of local, network, mainframe and database usage
- In-Depth electronic security monitoring and incident response technologies and dedicated security staff
- Systematic data backups performed with the backup media securely transported to, and stored at a Federal records holding center.

Section 9.0 – Technology

We validated that the applications that we use to interface with Palmetto GBA, meets all current Federal guidelines and directives via independent evaluation. Additionally, our Privacy and Security staff review all information system proposals in accordance with the E-Government Act of 2002 (Public Law 107-347) and Office of Management and Budget directives.

Conclusion

We use our contractor, Palmetto GBA, to provide customer services for requests for Medicare address changes, duplicate cards and notification of a beneficiary's death.

We take our obligation seriously to protect the data that we use to provide benefit services to our railroad workers. We do this by complying with Federal information and privacy laws, directives and guidance; by providing technical network defenses in depth; and by having established management and operational controls in place to manage our information systems.

Certification of Responsible Officials

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PIA Control Number PIA-20090714-001