Acronyms

ATO - Authorization to Operate
CAC - Common Access Card
FISMA - Federal Information Security Management Act
ISA - Information Sharing Agreement
HHS - Department of Health and Human Services
MOU - Memorandum of Understanding
NARA - National Archives and Record Administration
OMB - Office of Management and Budget
PIA - Privacy Impact Assessment
PII - Personally Identifiable Information
POC - Point of Contact
PTA - Privacy Threshold Assessment
SORN - System of Records Notice
SSN - Social Security Number
URL - Uniform Resource Locator

General Information

Status:	Approved	PIA ID:	1439658
PIA Name:	HRSA - SPO - QTR1 - 2022 - HRSA795334	Title:	HRSA - Microsoft SharePoint
OpDIV:	HRSA		

PTA

PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Initiation
PTA - 1B:	Is this a FISMA-Reportable system?	Yes
PTA - 2:	Does the system include a website or online application?	Yes

URL Details

Type of URL	List Of URL
Publicly accessible website with log in	SharePoint Online provides the ability for sites to be configured to be publicly accessible with log in. While no sites are currently designated to be publicly accessible, they would fall under the following URL: https://nih.sharepoint.com/sites/ Explicit URLs will be added upon configuration of public accessibility.

PTA - 3:	Is the system or electronic collection, agency or contractor operated?	Agency
PTA - 3A:	Is the data contained in the system owned by the agency or contractor?	Agency
PTA - 5:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	No
PTA - 5B:	If no, Planned Date of ATO	5/31/2022
PTA - 6:	Indicate the following reason(s) for this PTA. Choose from the following options.	New
PTA - 7:	Describe in further detail any changes to the system that have occurred since the last PIA	No changes. PTA is for a new system.
PTA - 8:	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the	SharePoint Online for HRSA is a cloud-based software as a service (SaaS) offering hosted

system carries out those functions?

within the NIH/CIT Office 356 tenant. SharePoint Online for HRSA provides enterprise-wide collaboration and content management by allowing users to create, store, manage, and access information, documents, and files. SharePoint Online for HRSA provides advanced search capabilities for all content and metadata stored within the system and leverages role and permissions based accessed control to limiting access of content to only the individuals who require it. In addition to the content management, SharePoint Online for HRSA aids in staff productivity by providing data and workflow capabilities for automation of business processes.

The primary functions of SharePoint Online for HRSA are to:

1) Provide an enterprise-wide solution for collaboration and content management, allowing users to create, store, manage, and access information, documents, and files.

2) Host both HRSA team sites (for collaboration) and the HRSA intranet for communication and dissemination of information.

3) Increase staff productivity and efficiency by providing the ability to automate existing manual business processes.

4) Provide secure storage of data via permissions-based access to limit access of content to only the individuals who require it.

5) Provide advanced search capabilities allowing users to quickly locate relevant information, documents and files.

6) Provide Section 508 compliance and support for records management for all content within the platform.

HRSA's Microsoft SharePoint system makes tools and services available to all employees and contractors within HRSA, empowering them with the ability to manage content (i.e., documents, information, and data), and to collaborate with others in order to support HRSA's mission.

PTA - 9:	List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.	The information collected, maintained and shared within HRSA SharePoint Online falls into three main categories: 1. Document repositories for standard file types and content such as Microsoft Word, Excel, PowerPoint, OneNote, and Portable Document Format (PDF) files. 2. Data and information (i.e., site content) stored within SharePoint site pages and SharePoint lists within customer team site and intranet sites. 3. Data and information stored within SharePoint based solutions build using SharePoint's list and workflow capabilities. The information within these three categories contains both sensitive and non-sensitive data elements. Since the data and files stored within the system span all of HRSA's business areas, the types of information stored is diverse, consisting of 64 distinct information type across 3 information categories, including 'Government Resource Management', 'Mission Areas and Information Types', and 'Services Delivery Mechanisms and Information Types'. Additional details can be found in the Information Type section within System Categorization.
PTA -9A:	Are user credentials used to access the system?	Yes

PTA - 9B:	Please identify the type of user credentials used to access the system.	HHS User Credentials
		
		  HHS/OpDiv PIV Card
		
		Non-HHS User Credentials
		
		  Email address
		
		  Password
		
		  Username

PTA - 10:	Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual	The requirement to support all of HRSA's bureaus and offices and business areas, necessitates the HRSA SharePoint Online system to allow users to have the ability to store a very broad set of information types. In addition to the information types stored by users, there are two other systems, which share information with HRSA SharePoint Online. 1. Strategic Work Information and Folder Transfer (SWIFT) system – An electronic document management system which stores information pertaining to HRSA correspondence, HRSA regulations and Federal Register notices, and reports, memoranda, and briefings to Congress, and executives within HHS. 2. NOFO Navigator System – A system for tracking the review of notice of funding opportunities (NOFOs) within HRSA. This system stores documents related to the NOFO guidance development and review processes within HRSA.

PTA - 10A:	Are records in the system retrieved by one or more PII data elements?	No
PTA - 11:	Does the system collect, maintain, use or share PII?	Yes

PIA		
PIA - 1:	Indicate the type of PII that the system will collect or maintain	Social Security Number
		Name
		Mother's Maiden Name
		E-Mail Address
		Phone numbers
		Taxpayer ID
		Date of Birth
		Financial Account Info
		Passport Number
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared	Employees/ HHS Direct Contractors
		Public Citizens
		Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system	Above 2000
PIA - 4:	For what primary purpose is the PII used?	PII is used to support various program and business needs of the bureaus/offices within HRSA for purposes of supporting HRSA's mission.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research)	There are no secondary uses of PII.
PIA - 6:	Describe the function of the SSN/Taxpayer ID.	Per the NIH and HRSA SharePoint Online governance policies, storage of Social Security Numbers (SSNs) is not permitted within SharePoint Online. However, at present, there is no active enforcement of this policy, so it is possible for SSN or Taxpayer ID to be present within files hosted on the HRSA SharePoint application. In those cases, the function of the SSN/Taxpayer ID are to support various business needs and functions within HRSA.
PIA - 6A:	Cite the legal authority to use the SSN	Legal authorities vary depending on the specific program and bureau/office needs where use of SSN is required.
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	Departmental Regulation 5 USC 301
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains
		In-person
		Email
		Online

		Government Sources
		Within the OPDIV
		Non-Government Sources
		Members of the Public
PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	Approval numbers vary depending on the specific program and bureau/office needs.
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	No
PIA - 11:	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason	Notification of individuals of the collection of their personal information is conducted by the program or bureau/office where the data is collected. The SharePoint Online system does not facilitate or directly conduct notification activities.
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 13:	Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason	There is no option directly within the SharePoint Online system for users to opt-out of entering their PII. Instead, users can choose not to enter their personal information, by communicating with the program or bureau/office where the data is being collected.
PIA - 14:	Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of original collection). Alternatively, describe why they cannot be notified or have their consent obtained	The SharePoint Online system does not facilitate or directly conduct PII notification or consent activities. All notifications to and consent from individuals whose PII is contained in the system are managed by the program or bureau/office where the PII data is collected and managed. Additionally, SharePoint Online serves as a repository for standard file types, which may contain PII, and does not collect PII directly. Therefore, system changes do not typically affect PII disclosure and/or data uses.
PIA - 15:	Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate. If no process exists, explain why not	Standard HRSA Incident handling procedures are used if PII has been inappropriately obtained, used, or disclosed. If PII is inaccurate, the program or bureau/office where the data is collected is responsible for working with the individual(s) to edit or correct the PII.
PIA - 16:	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy. Please address each element in your response. If no processes are in place, explain why not	Periodic reviews of PII contained in the SharePoint Online system are managed by the program or bureau/office where the data is collected and managed. The processes vary based on the data being collected and the program or bureau/office responsible for collecting and managing the PII.
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users Administrators Contractors
PIA - 17A:	Provide the reason of access for each of the groups identified in PIA -17	

	Users require access to enter and edit data to support HRSA business needs, processes, and requirements. Administrators require access to create new lists, sites, sub-sites, folders, to support business unit requirements. Contractors require access to create new lists, sites, sub-sites, folders, to support unit requirements.	
PIA - 17B:	Select the type of contractor	HHS/OpDiv Direct Contractor
PIA - 18:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	Access is granted to SharePoint Online sites by via SharePoint permissions management, and SharePoint and Microsoft 365 groups. The permissions and groups are managed by Site Administrators within programs and bureaus/offices.
PIA - 19:	Describe the technical methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job	SharePoint Online permissions management allows for unique permissions to be granted at site, library, folder, and item (i.e., document or list item) levels, which allow access to PII data to be restricted to only individuals who require access to perform their job duties.
PIA - 20:	Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained	The annual HRSA Cybersecurity Awareness Training,
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	In addition to the annual HRSA Cybersecurity Awareness Training, HRSA provides the following SharePoint training: (a) SharePoint Intro to HRSA Intranet (b) SharePoint for Site Administrators – Site Contents and Navigation Pane (c) SharePoint for Site Administrators – Types of Sites, Training Resources and Intro to Permissions (d) SharePoint for Site Administrators – More About Apps (e) SharePoint for Site Administrators – Adding Files and Columns to a Document Library (f) SharePoint for Site Administrators – Utilizing Lists within SharePoint Sites (g) SharePoint for Site Administrators – Views and Alerts (h) SharePoint for Site Administrators – WebParts on Site Pages
PIA - 23:	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific NARA records retention schedule(s) and include the retention period(s)	Retention and destruction of PII and documents containing PII within the HRSA SharePoint Online system is handled by the program or

		bureau/office where the data is collected. The data/content owners, in conjunction with the designated records liaisons, manage the data in accordance with the applicable National Archives and Records Administration (NARA) records schedules. The applicable NARA General Records Schedules (GRS), Records Controls Schedules (RCS), and corresponding retention and destruction periods vary depending on the program and business needs under which the PII data is collected.
PIA - 24:	Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response	Some PII and Sensitive Information (SI) may be stored on SharePoint Online as long as the permissions are properly maintained to limit access to only the individuals who require access in order to perform their job duties. The site owners where the PII information is stored will grant user access on a need-to-know basis. Generally, there are three SharePoint user groups for each site: 1) Site Owners who control the site content as well as the content access; 2) Site Contributors who control site content; and 3) Visitors who can read content. Per NIH's and HRSA's SharePoint Online governance policy, storage of SSNs is not permitted within SharePoint Online, and sites open for all of HRSA to access or set to allow access by external users are not permitted to contain PII or SI.
PIA - 25:	Describe the purpose of the web site, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response	The primary purpose of SharePoint Online sites is to disseminate information and facilitate collaboration within and across programs and bureaus/offices within HRSA and to facilitate collaboration with partners external to HRSA. All HRSA employees have access to SharePoint Online sites, but only to sites where they have been granted permissions. Access for internal users is through either the HRSA Virtual Private Network (VPN) and single sign-on, or via public URL with multifactor authentication. External users can only access SharePoint Online sites, which have been set to be externally facing. External users also need to be granted permissions to access the site by the Site Owner. Access for external users is via public URL with M365 account credentials and through the NIH tenant.
PIA - 26:	Does the website have a posted privacy notice?	Yes
PIA - 27:	Does the website use web measurement and customization technology?	Yes
PIA - 27A:	Select the type of website measurement and customization technologies is in use and if it is used to collect PII	Session Cookies - Does Not Collect PII Persistent Cookies - Does Not Collect PII
PIA - 28:	Does the website have any information or pages directed at	No

	children under the age of thirteen?	
PIA - 29:	Does the website contain links to non-federal government websites external to HHS?	No