

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

PIA ID:	1078732	Title:	HRSA - HRSA Dynamics 365
PIA Name:	HRSA - HD365 - QTR1 - 2020 - HRSA587248		
OpDIV:	HRSA		

PTA

PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance
PTA - 1B:	Is this a FISMA-Reportable system?	No
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	https://hrsa-prod.cm9.dynamics.com/apps/nofonavigator

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)?	Yes
PTA - 5A:	If yes, Date of Authorization	8/23/2018
PTA - 6:	Indicate the following reason(s) for this PTA. Choose from the following options.	New
PTA - 8:	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions?	Microsoft Dynamics also known as HRSA Dynamics 365 (HD365) is used to collect, review, coordinate and track Notice of Funding Opportunity (NOFO) details. After the NOFOs are approved and closed in HD365, they are posted, outside the HD365 system, to the public as grants.
PTA - 9:	List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of	HD365 is used to track and manage the review and approval process for Notice of Funding

	<p>whether that information is PII and how long that information is stored.</p>	<p>Opportunity (NOFO's) (i.e. grants). The HD365 (system) will collect NOFO details, that includes information like Funding Opportunity Number, Funding Opportunity Name, Grant dollar amounts, Due Dates, Activity Code, approvals and their dates, relevant dates and additional details regarding the NOFO.</p> <p>The system collects information (i.e. user and admin credentials) about system in order to control access. This information includes: Username Email Phone Number Mailing Address User Group to which they belong. This information is used to control access to the system. This information is visible to all users and administrators.</p> <p>The system also collects an audit trail of database transactional information such as add, edit, delete to records. It collects audit trails of users that log-on and at what date/time. This information is available only to admins and Division of Grants Policy (DGP) users.</p>
<p>PTA - 9A:</p>	<p>Are user credentials used to access the system?</p>	<p>Yes</p>
<p>PTA - 9B:</p>	<p>Please identify the type of user credentials used to access the system.</p>	<p>HHS User Credentials</p> <p>HHS/OpDiv PIV Card</p> <p>Non-HHS User Credentials</p> <p>Email address</p> <p>Password</p> <p>Username</p>
<p>PTA - 10:</p>	<p>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</p>	<p>HD365 is a Software as a Service (SaaS) based solution which is deployed and managed in Microsoft Office 365 cloud. The configurations and customizations required for the project will be deployed within Dynamics. Business entity components like forms, business process flows, workflows, assemblies, fields, security etc. will be configured and stored within HD365 using admin user interface.</p> <p>The following fields will be collected and maintained permanently per HRSA records management policy. Funding Opportunity Name, Funding Opportunity Number, Fiscal year, Federal Agency Sub Op Division, Activity Code, Catalog of Federal Domestic Assistance (CFDA) Number, various dates along the workflow including estimated start date and award date.</p> <p>The system also collects non-sensitive PII information like Full Name, Email, Group etc for licensing, communication, authentication, and authorization. This information is not shared with any other system or entity.</p>
<p>PTA - 10A:</p>	<p>Are records in the system retrieved by one or more PII data</p>	<p>Yes</p>

	elements?	
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	Name E-Mail Address Phone numbers Mailing Address User Credentials
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared	Employees/ HHS Direct Contractors 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	201 - 500
PIA - 4:	For what primary purpose is the PII used?	The PII information is used for account creation, licensing, communication, authentication and authorization.
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	5 USC 301, Departmental Regulations.
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains Online Government Sources Within the OPDIV Non-Government Sources Other
PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	HD365 consist of different modules that support multiple programs in HRSA. Each of these programs are required to obtain an The Office of Management and Budget (OMB) clearance number for the data the program collect. HD365 is not required to obtain an Office of Management and Budget (OMB) clearance number because it is used mainly to publicize information on upcoming grants. The PII collected are only used for licensing, communication, authentication and authorization.
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	The personal information is already being collected as part of their employment application. Also, these information are stored in the HRSA

		Active Directory (AD).
		When users are added into the system on request, the system collects the PII information (full name, email and group) of the users. Users are asked to input email address in the login page to use the HD365. These information & certificates are verified with HRSA Active Directory to give access to the HD365.
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 to opt out of providing full name, email address and group to the HD365. As this PII information is already being collected as part of their employment application and use to create a user account.
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	Individuals are notified and consent during the hiring process.
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	The end user has the authority to make changes to information they've provide at any time by sending request to HRSA Office of Information Technology (OIT). In the event that PII or user credentials is inappropriately obtain or used the Network Operations Center (NOC) will notify the Information System Security Officer and Contracting Officer Representative (COR). The COR will then send an email to the affected party to apprise them to incident.
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	The system uses audit technology to track changes to the application and its data. HD365 Administrators review the audit logs frequently to ensure the integrity, availability, accuracy and relevancy of the data. The end users can access their information using their credentials to assess and evaluate their stored information.
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users Administrators Developers Contractors
PIA - 17A:	Provide the reason of access for each of the groups identified in PIA -17 Users - Review and contact the grantee for grant administration purposes. Administrators - Maintain, support, validate and verify the system. Developers - Develop, Maintain, support, validate and verify the system. Contractors - These are direct contractors who operate on behalf of the agency and use the agency's credentials when doing so. They maintain, support, validate and verify the system.	
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	The users (administrators, developers, and contractors) are vetted through the HRSA

	access PII	background investigation process. Once they have been cleared through that process, the HD365 COR authorizes and approves request for access. The users receive access to the system for the sole purpose of the roles to the perform their functions.
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	HD365 is a role-based system. Reviewers are only able to create/edit/monitor/access information associated with their specific grant programs. The system administrators/developers use PII to maintain and enhance the system.
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	All the internal users are required to complete HRSA annual security awareness training.
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	HRSA provides additional security and privacy training to significant users bases on their roles to handle PII and user credentials.
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)	System currently retains PII for licensing, communication, authentication and authorization. We are working with HRSA's Records Management Office, who are in turn working with National Archives and Records Administration (NARA) to obtain the appropriate records and retention schedule. Currently, the user information is retained indefinitely.
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	<p>HD365 is a SaaS. HRSA Dynamics inherits the FedRAMP ATO from Microsoft Dynamics which provide a standardized approach for assessing, monitoring, and authorizing cloud computing products and services under the Federal Information Security Management Act (FISMA).</p> <p>The physical control is achieved by storing the PII in the cloud. Administratively, only employees and contractors are given access to the system to avoid unauthorized access. These individuals have undergone a background and security investigation during the hiring process.</p> <p>As a technical control, a user must first enter email id in the login page using HRSA laptop which is connected to HRSA network. Microsoft then checks Dynamics 365 license and Security Privileges configured in HD365. Only then a user can access PII based on his role and/or privilege granted.</p>
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	Provide detail on question 25 upon initial review of PIA.
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	Session Cookies - Does Not Collect PII

	technologies is in use and if it is used to collect PII	Persistent Cookies - Does Not Collect PII
PIA - 28:	Does the website have any information or pages directed at children under the age of thirteen?	No
PIA - 29:	Does the website contain links to non-federal government websites external to HHS?	No