

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:	1303469		
PIA Name:	HRSA - HDF - QTR4 - 2020 - HRSA616187	Title:	HRSA - DocuSign
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?	No
PTA - 3:	Is the system or electronic collection, agency or contractor operated?	Contractor
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	5/13/2020
PTA - 5B:	If no, Planned Date of ATO	5/29/2020
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?	DocuSign is a San Francisco- and Seattle-based company that provides electronic signature technology and Digital Transaction Management

		<p>services to facilitate electronic exchanges of contracts and signed documents. DocuSign's features include authentication services, user identity management, and workflow automation. Signatures processed by DocuSign are comparable to traditional signatures based on the product's compliance with the E-SIGN Act as well as the European Union's Directive 1999/93/EC on electronic signatures.</p> <p>The DocuSign application will be used by the Human Resource Program to facilitate the paperless submission of application forms through the on-boarding employee process.</p>
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.	<p>DocuSign only targets PII data fields related to the agency customer's technical administrator during the deployment phase of the DocuSign Federal system for an agency customer.</p> <p>This data field is targeted to collect and store PII of name, physical address, and email address for the technical administrator who acts as the point-of-contact (POC) within the agency customer's organization. DocuSign collects SSN, Name, Date of Birth, E-mail address, Mail address, Phone Numbers and Military Status</p>
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.	<p>HHS User Credentials</p> <p>HHS Email Address</p> <p>HHS Password</p> <p>HHS Username</p>
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	<p>DocuSign Federal is a SaaS application oriented towards federal government entities. Operated and managed as a government community cloud, DocuSign Federal provides government customers with an enterprise signing service to facilitate paperless workflow management. More information about DocuSign Federal can be found here: www.docusign.com.</p> <p>The Human Resource office uses the DocuSign tool to collect PII approved by the OMB No. 3206-0182 form such as SSN, Name, Date of Birth, E-mail address, Mail address, Phone Numbers and Military Status</p>
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	<p>Social Security Number</p> <p>Name</p> <p>E-Mail Address</p> <p>Phone numbers</p>

		Military Status
		Date of Birth
		Mailing Address
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared	Employees/ 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?	DocuSign only targets PII data fields related to the agency customer's technical administrator during the deployment phase of the DocuSign Federal system for an agency customer. This data field is targeted to collect and store PII of name, physical address, and email address for the technical administrator who acts as the point-of-contact (POC) within the agency customer's organization. The PII information collected by the DocuSign tool used by the Human Resource Program facilitate the on-boarding employee process.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research)	DocuSign does not use PII for testing training or research
PIA - 6:	Describe the function of the SSN/Taxpayer ID.	SSN is collected but not used by DocuSign application tool.
PIA - 6A:	Cite the legal authority to use the SSN	Executive Order 9397 numbering system for federal accounts relating to individual persons. Citation: E.O. 9397
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	Executive Order 9397 numbering system for federal accounts relating to individual persons.
PIA - 8:	Provide the number, title, and URL of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or indicate whether a new or revised SORN is in development.	OPM GOVT-1 OPM/GOVT-2
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains Email Online
PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	OMB No. 3206-0182
PIA - 9B:	Identify the OMB information collection expiration date.	1/25/2025
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	When a new employee subscribes to the DocuSign Federal system, the agency customer is consenting to the collection and use of their information. A new employee is consenting to the collection and use of their information by accessing the use of DocuSign's websites, mobile applications, Web Client, Professional Client, and/or any of DocuSign's other sites, products, or services linked to DocuSign's services as noted in their Privacy Policy.

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	It is not possible to opt-out. All PII information collected is necessary as part of the federal hiring process
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	When a new employee subscribes to the DocuSign Federal system, the new employee is consenting to the collection and use of their information. Noted in DocuSign Privacy Policy.
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	There is no process, as individuals are notified at the time they submit the information stored in DocuSign that it will be used for legitimate purposes and it will not be disclosed unless authorized by law.
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	Annual updates used to maintain accuracy of data.
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users Administrators
	Provide the reason of access for each of the groups identified in PIA -17 USERS: Users have access to PII as part of the hiring process data collection ADMINISTRATOR: DocuSign provides limited PII-level access to DocuSign personnel authorized to access the DocuSign Federal system for operational, maintenance, security, and customer support purposes. DocuSign roles that have access to the DocuSign Federal system include Product Security, Security Operations, Technical Operations, and Customer Support. DocuSign personnel only have access to PII relating to eDocument transactional information for customer support purposes.	
PIA - 17A:		
PIA - 18:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	DocuSign Federal employs multiple mechanisms to prevent the misuse of PII by those having access. The only accessible PII information is eDocument transaction records which include information regarding the sender and recipients (name and email address). This eDocument transaction record is only accessible by DocuSign Customer Support staff (administrator) who are given the eDocument Transaction ID by the HRSA Human Resources system owner. All PII information within a DocuSign Envelope (eDocument) is encrypted with DocuSign staff not having physical or logical access
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	DocuSign provides limited PII-level access to DocuSign personnel authorized to access the DocuSign Federal system for operational, maintenance, security, and customer support purposes. DocuSign roles that have access to the DocuSign Federal system include Product Security, Security Operations, Technical Operations, and Customer Support. DocuSign personnel only have access to PII relating to eDocument transactional information for customer support purposes.
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	DocuSign requires all DocuSign personnel to undergo annual awareness and security training (including privacy training) upon hire before

	responsibilities for protecting the information being collected and maintained	personnel are granted access to the DocuSign Federal system. Additionally, DocuSign provides annual awareness and security training to all DocuSign personnel. DocuSign requires contractors to undergo the same training.
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	System users receive training related to their job responsibilities in addition to security and privacy awareness training. Security and privacy awareness training is conducted annually. Job training is provided as needed.
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)	DocuSign establishes retention periods for PII within the DocuSign Federal system. PII within DocuSign envelopes and envelope-transactional data is stored as long there is a business purpose within the system for audit, legal, and customer use. HRSA Human Resources system owner has the capability to configure their own record retention policy within the system in order to control the defined time frame of purging data from their account.
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>HRSA Human Resources system data associated with DocuSign Federal system is considered restricted, confidential, and sensitive, in accordance with DocuSign information classification standards. DocuSign Federal provides consistent information flow protections for all customer data permitted within DocuSign Federal, regardless of sensitivity level. Federal user entities are responsible for ensuring that no information with a security impact level greater than moderate is stored, processed, or transmitted via the services provided to them.</p> <p>For HRSA Human Resources users signing or reviewing of documents hosted within DocuSign Federal, an email is generated by the customer, which includes unique and time sensitive links back to DocuSign Federal production webservers that allow the customer client to securely review and sign the respective document. All customer documents and supporting data are securely retained for the lifetime of the document.</p>