

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

06/21/2016

OPDIV:

HRSA

Name:

HRSA SalesForce

PIA Unique Identifier:

P-7668094-517131

The subject of this PIA is which of the following?

General Support System (GSS)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

Is this a FISMA-Reportable system?

No

Does the system include a Website or online application available to and for the use of the general public?

No

Identify the operator.

Agency

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

No

Indicate the following reason(s) for updating this PIA.**Describe the purpose of the system.**

The purpose of this system is to track customer interactions from use of Health Resources and Services Administration Electronic Handbooks system (EHBs), Bureau of Health Workforce Management Information System Solution system (BMISS), and communication solution for the Bureau of Primary Healthcare (BPHC). These customer interactions will be generated via phone calls or web contacts and addressed by agents in the contact center located in Tempe, Arizona or by the BPHC helpline agents in Rockville, Maryland. The contact center is a physical location and not located in any system.

Describe the type of information the system will collect, maintain (store), or share.

Name is collected to identify the customer experiencing an issue and needed for follow-up once services have been restored.

Email is collected to communicate with customers when they are unavailable by phone. Also used to provide auto-responses from webform submissions which provides a ticket number of the reported

incident or inquiry.

Username is collected to allow agents to access the test systems of the user experiencing an issue or needing assistance to navigate the Electronic Handbooks.

Organization information is collected for the purpose of the Bureau of Primary Healthcare tracking of sites that are receiving grants. Also useful for trending data on specific regions.

Grant number is used to track specific programs and provide trend data on contacts received pertaining to the organizations specific grant.

BMISS ID is collected for the loans and scholarships participants serving an obligation for BHW. This information is used by program to trend callers who called in for clarification on his her obligation or needing assistance with their BMISS portal account.

Application number is used to collect information about particular applications submitted through the Grants.gov website and used for diagnosing issues for customers having trouble submitting an application.

Tracking Number is collected in conjunction with the application number to identify the specific application for a particular organization.

Description of incident is a summary of the reason for the contact and what disruption or question the caller needs.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

This system serves as a repository to collect customer interactions as it relates to his/her use of the Electronic Handbooks system, the BMISS system, or communication of customer inquiries. All information collected, stored or shared is used to identify the user or organization experiencing an issue or having a question about the system in question. At a minimum, we collect the name to identify who is placing the call. We collect the phone number in case of a disconnect or need to follow-up. The organization information, username, BMISS ID, application number, tracking number are only collected if necessary to address the issue reported. However, this information is stored within the record maintained permanently until HRSA decides to destroy.

User and administrator information that is collected to control the system is the email address and name. This is only to provide tracking of who has access to login to the system. The information is not used for any additional sharing.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Name

Biometric Identifiers

E-Mail Address

Mailing Address

Phone Numbers

BMISS ID (unique number provided to participants in the loan or scholarship program)

Organization Information (grantee organizations)

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Employees

Public Citizens

Business Partner/Contacts (Federal/state/local agencies)

How many individuals' PII is in the system?

50,000-99,999

For what primary purpose is the PII used?

Provide identification of the user or organization experiencing the issue with use of EHBs or BMISS.

Describe the secondary uses for which the PII will be used.

N/A

Identify legal authorities governing information use and disclosure specific to the system and program.

5 USC 301

Are records on the system retrieved by one or more PII data elements?

No

Identify the sources of PII in the system.

Email

Other

Non-Governmental Sources

Public

Identify the OMB information collection approval number and expiration date

N/A

Is the PII shared with other organizations?

No

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 callers call in a message is provided to notify the caller that call may be recorded. No process is in place to notify individuals that their personal information is collected. We will make the update to our website to provide this disclaimer.

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

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.

Salesforce must collect the specific PII in order to effectively track customer interaction. This is limited to name, email address, phone number, and/or organization.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

This is not in place. We don't notify users who call in for service to opt out of this PII as we would not have any way of conducting follow-up with customers without contact information.

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.

No process has been developed for this. As customers are required to provide their names and phone numbers for follow-up purposes and is minimal in sensitivity.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

No periodic review is in place since the collection of the PII is minimal sensitivity.

Identify who will have access to the PII in the system and the reason why they require access.

Users:

Collecting customer information for tracking a particular issue

Administrators:

Address routing or issues with tickets

Contractors:

Direct contractors working on behalf of HRSA.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

Management initials and approves request for account creation to support job duties. Assigned internal role based controls based on specific job duties. Administrators have the role of creating accounts. Their only access is from a visibility standpoint when address issues. Users are collecting PII from customers who contact HRSA's contact center seeking assistance. They are collecting these only as a means for follow-up after the resolution of an incident.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

This PII (name, email address, phone number) that is collected or accessed is minimal information needed to keep track customers who have reported an issue. These are role based controls within the system and determined during the creation of accounts. All users and administrators sign and comply with the Rules of Behavior.

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.

We are using the HRSA Annual Security Awareness training for this requirement.

Describe training system users receive (above and beyond general security and privacy awareness training).

Users must complete the annual HRSA Security Awareness training.

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

No

Describe the process and guidelines in place with regard to the retention and destruction of PII.

Records are being retained indefinitely until a RCS Schedule is determine.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Administrative security is controlled through HRSA annual security awareness training and Annual Privacy Training.

Technical controls are achieved by automatic logoff for inactivity and account management for authorized users.

Physical controls are protected by Salesforce on a 24x7 basis for monitoring and first response by engineers.