Privacy Impact Assessment (PIA): HRSA - AC - QTR3 - 2020 - HRSA609650

Date Signed: 7/20/2020

Approved

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:	1125169
PIA Name:	HRSA - AC - QTR3 - 2020 - HRSA609650	Title:	
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
PTA - 2A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	

URL Details

Type of URL		List Of URL	
Internet (publicly available) https://hrsa.		https://hrsa.connectsolutions.com/	
Internet (public	ly available)	https://hrsa.connectsolutions.com/	
PTA - 3:	Is the system or electronic operated?	collection, agency or contractor	Contractor
PTA - 3A:	Is the data contained in the contractor?	e system owned by the agency or	Agency
PTA - 5:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		No
PTA - 5A:	If yes, Date of Authorizatio	n	
PTA - 5B:	If no, Planned Date of ATC)	12/31/2020
PTA - 6:	Indicate the following reas following options.	on(s) for this PTA. Choose from the	PIA Validation (PIA Refresh)

PTA - 7:	Describe in further detail any changes to the system that have	No Changes to the Adobe Connect Application.
PTA - 7: PTA - 8:	Describe in further detail any changes to the system that have occurred since the last PIA 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?	Adobe Connect is an Enterprise web conferencing solution used as an agency collaboration tool for online meetings, eLearning, and webinars. With Adobe Connect, you can create online meetings and virtual classroom using powerful multimedia tools, including live video streams, integrated audio, interactive simulations, and virtual breakout rooms. Adobe Connect broadcasts audio in meeting or training sessions using Voice over Internet Protocol (VoIP) and the microphone on attendees' computer system. Adobe Connect supports the following solutions for adding audio to meeting and training sessions: Built-in VoIP Adobe Connect broadcasts audio in meetings or training sessions using VoIP and the microphones on attendees' computer systems. Universal Voice Audio Providers Universal Voice audio providers enable Adobe Connect to broadcast all telephone-based audio into an Adobe Connect meeting room over VoIP. Both account administrators and hosts can configure audio conferencing providers for universal voice Integrated Telephony Adaptors without Universal Voice This solution provide communication between Adobe Connect and specific audio conferencing provider (PGi). Integrated adaptors have advanced call capabilities, allowing hosts control the audio conference from the meeting.
		the audio conference from the meeting. HRSA end-users currently leverage the Universal Voice Audio Provider option by using Verizon telephony services to broadcast audio for all meeting and training. As part of a modernization effort, HRSA Adobe Connect instance will offer Integrated Telephony Adaptor as an option.
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.	For Adobe Connect participants (guest, HRSA user, HRSA meeting organizer, HRSA host), the system collects and maintains the person's name and email address. The system can also be used to record, store and share meetings hosted by Adobe Connect, to include the voice and video of individuals from within the meeting.
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
	System.	HHS Email Address
		HHS Username
		Non-HHS User Credentials
		Email address
		Password
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 capability for hosting virtual meeting; to include audio, video and application sharing, and agency related trainings. Adobe Connect system collects and maintains
		the user's name and email address, Adobe Connect account credentials, to authenticate the level of access the user will be allowed to the system. The content presented (documents, voice and video) during an Adobe Connect meeting can be recorded and shared for later viewing by participants that missed the original meeting.
PTA - 10A:	Are records in the system retrieved by one or more PII data elements?	Yes
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
		User Credentials
		Others - Meeting Recordings (voice and video of individual participants)
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?	The primary purpose for the PII is for accessing Adobe Connect.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research)	The secondary PII usage is for tracking training completion.
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program $$	5 USC 301, Departmental regulations
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.	Not Applicable
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
PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	N/A. Information collected into and/or maintained in Adobe Connect is not subject to OMB Control Numbers.
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	Individual users of the Adobe Connect service are presented with the HHS standard System Use Notification. The Banner is located on the HRSA Adobe Connect portal landing page.

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 method for an individual to opt-out of the collection or use of their PII (name and email address) because the information is required for a user account to access the Adobe Connect service.
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 HHS standard System Use Notification (Warning Banner) discloses to the users that they are providing consent by using the system.
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	Incidents can be reported to the Incident Response Team (IRT). The IRT mitigate the risks associated with the inadvertent loss or unapproved disclosure of personally identifiable information (PII).
		The IRT participates in the investigation and resolution of incidents. To mitigate a reported issue, the IRT may request assistance from the appropriate human resources office or contractor representative. The IRT shall determine what actions need to be taken, and they shall be responsible for completing the investigation of the employee's case in conjunction with other appropriate departmental offices.
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	HRSA's Adobe Connect Team follows the Standard Operating Procedure (SOP), Adobe Connect Account Management, to manage user accounts and the periodic review of PII data (name and email address).
		Adobe Connect Administrators are responsible for Account Management which includes:
		Complete quarterly reviews on the Adobe Connect accounts to determine if accounts are no longer required.
		Granting access to authorized users to the appropriate Adobe Connect group
		Enabling, modifying, disabling, and removing accounts
		Only registered users have access to the Adobe Connect system.
PIA - 17:	Identify who will have access to the PII in the system and the	Users
	reason why they require access	Administrators
		Contractors
PIA - 17A:	Provide the reason of access for each of the groups identified in Pl	A-17

Users - to invite participants to hosted meeting using the individuals name listed in the system. The user has to be a member of a built in group to create/invite meetings Administrators - to create, manage and monitor Adobe Connect user accounts Contractors - The Cloud Service Providers (CSP) are direct contractors and provide the hosted environment for the HRSA Adobe Connect instance. The CSP has access to the system PII and provides maintenance support and Tier III support for the system. No CSP PII data is protected by the FedRAMP boundaries and are not viewable by HRSA Adobe Connect account holders. Select the type of contractor PIA - 17B: HHS/OpDiv Direct Contractor Describe the administrative procedures in place to determine which Adobe Connect has built-in groups for managing PIA - 18: system users (administrators, developers, contractors, etc.) may the different level of access a user is allowed to access PII the system. Only members of the built-in groups can access a user's PII (name and email address and recording of a hosted meeting, to include the voice and video of individuals). Users, Administrators and Contractors can be added as a member of any of the built-in groups. Describe the technical methods in place to allow those with access HRSA's Adobe Connect Support team has direct PIA - 19: to PII to only access the minimum amount of information necessary access to manage the Adobe Connect to perform their job application. Adobe Connect has nine built-in permission groups, each associated with a different level of privilege. The only PII information collected and stored in the Adobe Connect system is a user's name and email address. This information is used by other Adobe Connect users to select and invite participants to scheduled meetings and trainings. Identify training and awareness provided to personnel (system All HRSA personnel is responsible for completing PIA - 20: owners, managers, operators, contractors and/or program an annual Information Security and Privacy managers) using the system to make them aware of their Awareness Training responsibilities for protecting the information being collected and maintained Describe training system users receive (above and beyond general Not Applicable PIA - 21: security and privacy awareness training). Describe the process and guidelines in place with regard to the GENERAL RECORDS SCHEDULE 3.2: PIA - 23: retention and destruction of PII. Cite specific NARA records Information Systems Security Records retention schedule(s) and include the retention period(s) (DAA-GRS-2013-0006-0004) ITEM 31 - System access records. These records are created as part of the user identification and authorization process to gain access to systems. Records are used to monitor inappropriate systems access by users. Includes records such as: • user profiles • log-in files • password files • audit trail files and extracts • system usage files • cost-back files used to assess charges for system use Systems requiring special accountability for access. These are user identification records associated with systems which are highly sensitive and potentially vulnerable. Destroy 6 years after password is altered or user account is terminated, but longer retention is authorized if required for business use.

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	Only approved HRSA resources have access to login to the Adobe Connect portal via a secure protocol using HTTPS. The Adobe Connect service is provided by a Cloud Service Provider (CSP) in a FedRAMP certified environment. Administrative Control: system account management Standard Operating Procedure (quarterly account review to determine user, ticketing system to request an Adobe Connect account, Management approval to request an Adobe Connect Account), Security training required before receiving a user account, Technical Control: the system requires user authentication, all communications happens over secure ports, scheduled vulnerability scanning to prevent unauthorized access. Physical Control: System is installed in a Single tenant model, physical access to the environment is limited to authorized personnel and is monitored 24X7 by Physical Security personnel.
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 website is a publicly available, and is used for video conference meetings and provides a platform for new HRSA employees and contractors to take mandatory Security and Privacy Awareness Training.
PIA - 26:	Does the website have a posted privacy notice?	No
PIA - 27:	Does the website use web measurement and customization technology?	No
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