Privacy Impact Assessment (PIA): OS - A2S Engage - QTR2 - 2021 - OS1084406

Date Signed: 4/20/2022

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

system carries out those functions?

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:	1439442
PIA Name:	OS - A2S Engage - QTR2 - 2021 - OS1084406	Title:	OS - Access2Success Engage eRegistration and eMatchmaking Platform
OpDlv:	os		

	PTA	
PTA -1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Initiation
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 access	https://access2success.hhs.gov	
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	5/31/2021
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	The software is used to identify small business' eligibility for matchmaking sessions contingent on

information provided during the registration

		process. All small businesses will be vetted and matched through the matchmaking software in accordance with the user's most relevant capabilities (based on North American Industry Classification System (NAICS) codes and/or user identified capabilities), buyer requirements and other HHS Office of Small And Disadvantaged Business Utilization (OSDBU) established criteria. During registration, small businesses will submit their company information via editable fields requesting specific information.
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 Access2Success (A2S) system will collect contact information of Small Businesses and Buyers (Email address, Full name, Title, Phone number (business mobile), Location (city, state)), Conference role (general attendee, moderator, speaker, panelist, exhibitor, and/or matchmaker, etc.), and Small Business Data Universal Numbering System (DUNS) number and Socio-economic Categories (8(a), HUBZone, WOSB (Women-Owned)) The information will be retained for five years.
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.	Non-HHS User Credentials 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	

		mobile), Location (city, state)) and Conference role (general attendee, moderator, speaker, panelist, exhibitor, and matchmaker, etc.) and Small Business Data Universal Numbering System (DUNS) number and Socio-economic Categories (8(a), HUBZone, WOSB (Women-Owned)) to register and create schedules for individual Matchmaking sessions in conjunction with the HHS A2S outreach events. The collected information will enable OSBDU to engage, equip, and inform small business participants of the federal procurement process to become more effective in pursuing contracting opportunities at HHS and assist the HHS OpDivs with achieving their missions. Specifically, OSBU will help small businesses to: 1. familiarize with the processing of procedures associated with federal Government contracting; 2. gain insight on identifying and pursuing contract opportunities with HHS; and 3. provide an opportunity for small businesses to attend matchmaking and networking sessions to meet with Government representatives in pre-scheduled meetings. OSBDU will not share with any other system or parties.
PTA -10A:	Are records in the system retrieved by one or more PII data elements?	Yes
PTA -10B:	Please specify which PII data elements are used.	By using any of the collected data fields, the record can be retrieved.
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
		Others - Contact information of Small Businesses and Buyers (Email address, Full name, Title, Phone number (business mobile), Location (city, state)), Conference role (general attendee, moderator, speaker, panelist, exhibitor, and/or matchmaker, etc.), and Small Business Data Universal Numbering System (DUNS) number and Socio-economic Categories (8(a), HUBZone, WOSB (Women-Owned))
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared	Business Partners/Contacts (Federal, state, local agencies)
		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	501 - 2000
PIA - 4:	For what primary purpose is the PII used?	The information will be used to register and

		create schedules for individual Matchmaking sessions in conjunction with the HHS Access2Success (A2S) outreach events. The collected information will enable Small And Disadvantaged Business Utilization (OSDBU) to engage, equip, and inform small business participants of the federal procurement process to become more effective in pursuing contracting opportunities at U.S. Department Health and Human Services (HHS) and assist HHS OpDivs with achieving their missions.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research)	None.
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	15 U.S. Code 644(k), Public Law 95-507 and 5 USC 301 Departmental regulations.
PIA - 9:	Identify the sources of PII in the system	Government Sources
		Within the OPDIV
		Other HHS OPDIV
		Other Federal Entities
		Non-Government Sources
		Private Sector
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	Yes
PIA - 10A:	Identify with whom the PII is shared or disclosed and for what	Other Federal Agency/Agencies
	purpose	Within HHS
PIA - 10A	Explain why (and the purpose) PII is shared with each entity or individual.	The primary purpose for sharing Buyers and Suppliers PII with HHS and with other federal

(Justification):		agencies is to create schedules for individual Matchmaking sessions to use in conjunction with the HHS A2S outreach events. These events enable the A2S team to engage, equip and inform small business participants of the federal procurement process so that they become more effective in pursuing contracting opportunities at HHS and assist the HHS OpDivs with achieving their missions. Specifically, 1) familiarize small businesses with the processing of procedures associated with federal Government contracting; 2) gain insight on identifying and pursuing contract opportunities with HHS; 3) provide an opportunity for small businesses to attend matchmaking and networking sessions to meet with Government representatives in pre-scheduled meetings. The secondary purpose is that it allows OSDBU to ensure that small businesses are given a fair and transparent opportunity to compete for contracts that provide goods and services to HHS; establishes, manages and tracks small business goal achievements; provides technical assistance and small business program training to OPDIV contracting and program officials; and conducts outreach and provides marketing and technical guidance to small businesses on contracting opportunities with HHS.
PIA - 10B:	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement, Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	15 U.S. Code 644(k) and Public Law 95-507 authorizes OSDBU for sharing or disclosing PII with HHS and other federal agencies. The system does not have any agreement in place for sharing PII.
PIA - 10C:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII	A2S protects PII of individuals by ensuring that personal information collected by Federal agencies is limited to that which is legally authorized and necessary and is maintained in a manner which precludes unwarranted intrusions upon individual privacy.
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	Small Businesses voluntarily submit contact information in conjunction with the HHS A2S outreach events to receive service from OSDBU, . The collected information enables OSBDU to engage, equip, and inform small business participants of the federal procurement process to become more effective in pursuing contracting opportunities at HHS and assist the HHS Operating Divisions (OpDivs) with achieving their missions. A2S posts privacy notice disclaimer based on the Privacy Act.
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	If a small business desires to familiarize with the procedures associated with federal Government contracting, gain insight on identifying and

		pursuing contract opportunities with HHS, and obtain an opportunity for small businesses, it will supply PII as mentioned in PIA-1. By providing the PII, small businesses are able to attend matchmaking and networking sessions to meet with Government representatives in pre-scheduled meetings. Collection non-sensitive is completely voluntary. A2S posts privacy notice disclaimer based on the Privacy Act.
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 program office will email the account holder to contact HHS if there is a need for additional information or clarification in the event a significant change occurs to 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	This item is not applicable because the source of the PII is the contact person/representative of a small business. Only this individual voluntarily can enter PII into the system on behalf of a small business. The contact person/representative can always review and update the information to ensure its accuracy.
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	During the individual Matchmaking sessions in conjunction with the HHS A2S outreach events, Small Businesses will be able to verify and update the information of a person/representative of a small business.
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users
	reason why arey require access	Administrators
PIA - 17A:	Provide the reason of access for each of the groups identified in PIA-17 Users group represents Small Businesses and A2S HHS Federal Users. Small Businesses users will provide information collected information to enable Small And Disadvantaged Business Utilization (OSDBU) to engage, equip, and inform small business participants of the federal procurement process to become more effective in pursuing contracting opportunities at the U.S. Department of Health and Human Services (HHS) and assist HHS OpDivs with achieving their missions. The A2S HHS Federal users represents A2S staffs who identifies small businesses' eligibility for matchmaking sessions contingent on information provided during the registration process.	
	Administrators users group represents system administrator operation, and maintenance.	rs who are responsible for system's security,
PIA - 18:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	Only HHS A2S users have access to PII for determining small businesses' eligibility for matchmaking sessions and vetting process.
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	
PIA - 19:	to PII to only access the minimum amount of information necessary	determine who with the A2S program need access to the system and PII. Also, Role Based

as defined and provided by Department of Health & Human Services.

In addition to general security training, users receive training based on their roles. For example, system administrators will take IT Administrator's training. All of these trainings are provided by HHS.

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)

Per GENERAL RECORDS SCHEDULE (GRS) 3.1: General Technology Management Records, PII will be retained for five years or longer if required for business. PII will be destroyed five years after termination of the project, or when PII is no longer needed 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

The A2S system is a public-facing, cloud-hosted, web-application divided into a front-end, backend, and database. The application resides in the us-east-1 region within Amazon Web Services (AWS) infrastructure and is provisioned across multiple availability zones (AZ's). All AWS regions used to host Access2Success are located within the continental US on Fed RAMP approved technologies.

The backend is a Spring Java application running on a hardened java container image and connects directly to a MySQL AWS AuroraDB instance.

A2S is a Linux based system. Linux based system uses a masked password shadowed files where the only visible password will be a hash of the password. The hash is created from the password but the hash cannot be used to determine the password.

The system also implements role based access control and all audit logs are scanned and monitored for unusual behavior. Each account is designed for the person, and it is forbidden to be shared with another person.

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 identify small businesses' eligibility for address each element in your response matchmaking sessions contingent on it

Purpose: The purpose of the website is to identify small businesses' eligibility for matchmaking sessions contingent on information provided during the registration process. The website is targeted explicitly at Small Businesses so that OSBDU can engage, equip, and inform participants of the federal procurement process. This way, Small Businesses will become more effective in pursuing contracting opportunities at HHS.

User Access: Small Businesses will access the A2S website at https://access2success.hhs.gov by creating a user account and providing required information. Users log into the website using multi-factor authentication.

PIA - 26:	Does the website have a posted privacy notice?	Yes
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