

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

09/24/2013

OPDIV:

OS

Name:

Management Tools

PIA Unique Identifier:

P-3401387-967309

The subject of this PIA is which of the following?

Minor Application (stand-alone)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

Is this a FISMA-Reportable system?

Yes

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

No

Identify the operator.

Contractor

Is this a new or existing system?

Existing

Does the system have Security Authorization (SA)?

Yes

Indicate the following reason(s) for updating this PIA.

PIA Validation

Describe in further detail any changes to the system that have occurred since the last PIA.

Not Applicable

Describe the purpose of the system.

BMT is a hybrid program management solution created to manage projects and content.

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

The system does not collect any PII about members of the public, on a form or otherwise, or disseminate PII about members of the public. The PII in the system includes employees' photographic images and employee names. These are collected as part of a BARDA-only employee "Announcement Board" where each employees' professional expertise are described in brief notes. This PII is federal contact information.

Some information is federal contact information PII as indicated above.

Submission of the PII by employees is requested and encouraged, but is ultimately voluntary.

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

OS-ASPR Management Tools (BMT) acts as an extranet that allows controlled access to an information repository from Biomedical Advanced Research and Development Authority (BARDA) authorized vendors and contractors. It is an extension of the BARDA intranet that is extended to users outside of BARDA in isolation from all other Internet users.

BMT is used for the management of projects via a web server, management of content in a single repository, and as a collaboration software tool. Access to BMT is through a BARDA-issued user ID and password as authentication mechanisms to access web servers. BMT designates private parts of the repository, where registered users can navigate, enabled by authentication mechanisms on a login page.

The overarching benefits of BMT are:

1. Conversion of data into actionable information
2. Central management of acquisition projects and documents
3. Collaboration and coordination with partners in government.

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

Yes

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

Name

Photographic Identifiers

E-Mail Address

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

Employees

How many individuals' PII is in the system?

100-499

For what primary purpose is the PII used?

BMT is primarily a document repository. PII data elements may be viewed only by employees on a restricted portion of BMT. These images are used to maintain and build the BARDA organizational chart and accompanies each employee's personal biographical information for the purpose of contacting them for specific research as Subject Matter Experts. The photographic images are also maintained for the purpose of broadcasting performance awards and congratulatory messages, similar to an "announcement board" with picture clips.

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

None

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

The "Pandemics and All-Hazards Preparedness Act" (PAPHA) was enacted in 2006 to improve the nation's ability to detect, prepare for, and respond to a variety of public health emergencies. This act created the Biomedical Advanced Research and Development Authority (BARDA) under Office of the Assistant Secretary for Preparedness and Response (ASPR). This act was reauthorized in 2013 by the Pandemic and All-Hazards Preparedness Reauthorization Act of 2013, Public Law 113-5, signed into law on 13 March 2013. BARDA provides an integrated, systematic approach to the development and purchase of the necessary vaccines, drugs, therapies, and diagnostic tools to respond to public health medical emergencies. The agency is responsible, in coordination with federal, private sector, and international partners for procurement and advanced development of medical countermeasures for chemical, biological, radiological, and nuclear agents, as well as advanced development and procurement of medical countermeasures for pandemic influenza and other emerging, infectious diseases. The Management Tools system is key to carrying out these missions, and the limited collection and sharing of PII about employees is narrowly tailored to meeting this mission.

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

No

Identify the sources of PII in the system.**Directly from an individual about whom the information pertains**

In-Person

Email

Government Sources

Within OpDiv

Other HHS OpDiv

Non-Governmental Sources**Identify the OMB information collection approval number and expiration date**

Not Applicable

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.

Information is collected directly from BARDA employees, and they are therefore aware of what information they are providing. The minimal contact information is collected, and it is updated in the normal course of business.

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.

Employees are notified of how their names and photographic images will be used during the verbal information request and collection process. The process of submitting photographs is voluntary and employees have the option of not participating.

Information is collected directly from BARDA employees, and they are therefore aware of what information they are providing.

Names and photographs are viewed only by HHS BARDA employees in a section of BMT that is not accessible to vendors, contractors and members of the general public. Individuals are aware of the limited access to this intranet.

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

Employees are notified of how their names and photographic images will be used during the verbal information request and collection process. The process of submitting photographs is voluntary and employees have the option of not participating.

No major changes are expected, but if there were any, individuals are all HHS employees and could be notified via channels such as e-mail, phone, intranet, newsletters, and the supervisory chain.

Employees are notified of how their name and photographic images will be used during the verbal information request process.

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.

The BARDA organization point of contact (Office of the Director - OD) division of BARDA will maintain and update the contact names and photographs, and ensure that any inaccurate contact information is promptly corrected. The point of contact information is available through the Project Officer or Office of Acquisition Management, Contracts, and Grants Contract Officer, or Federal Manager. Any data subject that needs to have their information corrected or updated may do so by contacting any of these individuals who will relay the request to the front office.

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

Through the required periodic conduction of System Certification & Accreditation (C&A) and the Annual Review process, the Agency ensures the integrity, availability, and accuracy and relevancy of the information on BMT.

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

Access to documents stored on the System.

Administrators:

To administer the application and provide response/resolution to users technical issues.

Developers:

For technical configuration and maintenance of the application

Contractors:

Access to documents stored on the System.

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

Access control is role based, and limited to only those users who have a specific business need incident to their project, or operating the system, or public health response scenario. Federal managers must approve access in writing for any user to gain access to any program management application or software tool. Access is disabled for non-use, and promptly deleted upon transfer or retirement.

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.

Only the minimum amount of contact information is being collected, and access to that information is role-based. Access is limited by the implementation of information security controls in strict compliance with FISMA, such as requiring authentication of identify, and restricting access privileges. Over 160 security controls are in place on Barda Management Tools.

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.

Annual privacy and information systems security awareness training is required to obtain and maintain system access.

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

User training is required before access is granted to any component of BARDA Management Tools. In addition to software tool specific training, the contractor also conducts training quarterly on a variety of software applications where security and privacy compliance are included as part of the curriculum.

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

Yes

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

The Agency adheres to the Department's guidance regarding PII data retention and destruction.

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

Access to BMT is through a BARDA-issued userid and password as authentication mechanism to access web servers. BMT designates private parts of the repository, where registered users can navigate, enabled by authentication mechanisms on a login page.

Additional technical, administrative, and physical security safeguards implemented for BMT are detailed in the System Security Plan (SSP), Security Controls Catalogue (SCC), Information Technology Contingency Plan (ITCP), and SAS-70 (Hosting Facility Assessment) Report performed at the physical hosting facility/site (DYONYX).