

## Copy PIA (Privacy Impact Assessment)

Do you want to copy this PIA ?

Please select the user, who would be submitting the copied PIA.

## Instructions


Review the following steps to complete this questionnaire:

- 1) Answer questions.** Select the appropriate answer to each question. Question specific help text may be available via the  icon. If your answer dictates an explanation, a required text box will become available for you to add further information.
- 2) Add Comments.** You may add question specific comments or attach supporting evidence for your answers by clicking on the  icon next to each question. Once you have saved the comment, the icon will change to the  icon to show that a comment has been added.
- 3) Change the Status.** You may keep the questionnaire in the "In Process" status until you are ready to submit it for review. When you have completed the assessment, change the Submission Status to "Submitted". This will route the assessment to the proper reviewer. Please note that all values list questions must be answered before submitting the questionnaire.
- 4) Save/Exit the Questionnaire.** You may use any of the four buttons at the top and bottom of the screen to save or exit the questionnaire. The button allows you to complete the questionnaire. The button allows you to save your work and close the questionnaire. The button allows you to save your work and remain in the questionnaire. The button closes the questionnaire without saving your work.

### 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

<b>PIA Name:</b>	FDA - IBAPS - QTR1 - 2025 - FDA4901597	<b>PIA ID:</b>	2759683
<b>Name of Component:</b>	FDA - OC Integrated Budget and Acquisition Planning System	<b>Name of ATO Boundary:</b>	OC Integrated Budget and Acquisition Planning System
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	10
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	2/11/2025
<b>Next Assessment Date:</b>	N/A	<b>Expiration Date:</b>	1/1/2100
<b>Office:</b>		<b>OPDIV:</b>	FDA
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	FDA4901597
<b>Legacy PIA ID:</b>		<b>Make PIA available to Public?:</b>	No
<b>1:</b>	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
<b>2:</b>	Is this a FISMA-Reportable system?		Yes
<b>3:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		No
<b>4:</b>	ATO Date or Planned ATO Date.		3/6/2023
<b>5:</b>	Is the system or electronic information collection, agency or contractor operated?		Agency

## PTA

<b>PTA</b>		
<b>PTA - 2:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.	Significant System Management Change
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	<p>Since this Privacy Threshold Analysis/Privacy Impact Assessment was last approved, FDA made the following changes to the Integrated Budget Acquisition Planning System (IBAPS) application:</p> <p>1) Implementing IBAPS on a modernization platform using Appian platform from Digital Solution Partners (DSP) team. The system is being updated as an Agency wide solution and to remove the similar applications implemented at each Center level.</p>
<b>PTA - 3:</b>	Is the data contained in the system owned by the agency or contractor?	Agency

**PTA - 4:**

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.

The Food and Drug Administration (FDA) Office of the Commissioner (OC) Integrated Budget Acquisition Planning system (IBAPS) is a collection of modules that has automated and improved FDA's current planning and budgeting operations. As an end-to-end planning and budgeting solution, IBAPS is used to manage FDA's Budget Formulation, Budget Execution, Payroll planning, Advanced Acquisition Planning, Budget justification workflow, and reporting and dashboarding capabilities for FDA Centers and Offices.

The integration of formulation, planning and execution applications provide end-to-end budgeting solutions for FDA while eliminating process redundancies and promoting greater process efficiencies. FDA has eliminated manual data entry and validation by integration with the following data sources outside IBAPS the Human Resource Information System (CapHR), Integrated Time & Attendance System (ITAS), Accounting for Pay System (AFPS), and the Unified Financial Management System (UFMS).

IBAPS receives payroll and employee information from multiple HHS-wide and FDA-specific systems (assessed separately). Information received and used includes: (1) Employee Payroll Actuals: AFPS File from UFMS. Transferred using secure file transfer protocol (SFTP) and Defense Finance and Accounting Service (DFAS) is the payroll system that generates the payroll files that goes to AFPS where accounting is generated and transmitted to UFMS; (2) Employee Attributes from CapHR File from PSC. Transferred using SFTP; (3) Employee Hours from ITAS Files from PSC. Transferred using SFTP; and (4) Additional Employee Attributes from EASE (Database access).

The data received from the above sources is paired using the Social Security Number (SSN) available in all the source information. The SSN is used only for pairing the data and is not available in the IBAPS application for end-users of the system. SSN is stored in the staging tables that reside in the database.

Users of the system are permanent FDA employees and Direct Contractors. Users are authenticated via the FDA Single Sign-On (SSO) process using their FDA issued personal identification verification (PIV) card.

<b>PTA - 5:</b>	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>IBAPS is used to manage FDA's Budget Formulation, Budget Execution, Payroll, and Advanced Acquisition Planning and generate management reports. The system is used to conduct financial reconciliation, budgeting, and spending analyses using information about FDA expenses such as various procurements related to physical plant and supplies along with cumulative employee salaries, employee benefits, and all other expenditures.</p> <p>IBAPS collects personally identifiable information (PII) about FDA permanent employees and Direct Contractors. The following PII is sourced from other FDA systems (assessed separately): (a) Name; (b) Date of Birth (DOB); (c) Work e-mail address; (d) Work phone number and (e) Encrypted SSN.</p> <p>System Administrators and authorized end users have access to all PII with the exception of SSN. Encrypted SSN is used to pair payroll data through an automated backend process to be used by end users of the system. SSN is not visible on the user application interface. No employee records are queried in the system using SSN. Database Administrators (Admins) have access to PII for troubleshooting purposes only (e.g., confirming accuracy of aggregated data used for budget planning; data verification). Authorized end users have access to PII to complete assigned job responsibilities.</p>
<b>PTA - 5A:</b>	Are user credentials used to access the system?	Yes, but the user credentials are maintained in a separate system (e.g., AD, AMS) and not collected or maintained by this system. The system providing credentials is
<b>PTA - 5B:</b>	Please identify the type of user credentials used to access the system.	
<b>PTA - 6:</b>	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.	Information collected by IBAPS is used to manage FDA budget processes, including Budget Formulation, Budget Execution, Payroll, and Advanced Acquisition Planning. Information is also used for budget management reporting purposes. PII sourced from other HHS and FDA sources, about FDA permanent employees and Direct Contractors, includes the following: (a) Name; (b) Date of Birth (DOB); (c) Work e-mail address; (d) Work phone number and (e) Encrypted SSN.
<b>PTA - 7:</b>	Does the system collect, maintain, use or share PII?	Yes
<b>PTA - 7A:</b>	Does this include Sensitive PII as defined by HHS?	Yes
<b>PTA - 8:</b>	Does the system include a website or online application?	Yes
<b>PTA - 8A:</b>	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	No

<b>PTA - 9:</b>	Describe the purpose of the website, 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 purpose of the website is to enable users to plan and execute program activities. Users of the system include FDA employees and Direct Contractors. Users access the system via FDA's Single Sign-On (SSO) process and must use their FDA issued personal identity verification (PIV) card when accessing the internal only website using internal uniform resource locators (URLs).
<b>PTA - 10:</b>	Does the website have a posted privacy notice?	Yes
<b>PTA - 11:</b>	Does the website contain links to non-federal government websites external to HHS?	No
<b>PTA - 11A:</b>	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
<b>PTA - 12:</b>	Does the website use web measurement and customization technology?	No
<b>PTA - 12A:</b>	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	
<b>PTA - 13:</b>	Does the website have any information or pages directed at children under the age of thirteen?	No
<b>PTA - 13A:</b>	Does the website collect PII from children under the age thirteen?	
<b>PTA - 13B:</b>	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
<b>PTA - 14:</b>	Does the system have a mobile application?	No
<b>PTA - 14A:</b>	Is the mobile application HHS developed and managed or a third-party application?	
<b>PTA - 15:</b>	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
<b>PTA - 16:</b>	Does the mobile application/ have a privacy notice?	
<b>PTA - 17:</b>	Does the mobile application contain links to non-federal government websites external to HHS?	
<b>PTA - 17A:</b>	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
<b>PTA - 18:</b>	Does the mobile application use measurement and customization technology?	
<b>PTA - 18A:</b>	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
<b>PTA - 19:</b>	Does the mobile application have any information or pages directed at children under the age of thirteen?	
<b>PTA - 19A:</b>	Does the mobile application collect PII from children under the age thirteen?	
<b>PTA - 19B:</b>	Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
<b>PTA - 20:</b>	Is there a third-party website or application (TPWA) associated with the system?	No
<b>PTA - 21:</b>	Does this system use artificial intelligence (AI) tools or technologies?	No

**PIA**

<b>PIA - 1:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Social Security Number Name Email Address Phone numbers Date of Birth Other - Free text Field
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Employees/ HHS Direct Contractors
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	Employee name, work email address and work phone number are used for purposes of accurately processing records. Encrypted SSN is used within the system to validate and pair data. This data is strictly stored in the back-end database for automated processing only.
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	N/A
<b>PIA - 6:</b>	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	The SSN is used within IBAPS to validate individual level data provided by the source systems (AFPS (UFMS), ITAS (PSC), CapHR (PSC) and EASE (FDA)) and that is aggregated for the budget planning and reporting uses.
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	Executive Order 9397 as amended.
<b>PIA - 7:</b>	Identify legal authorities governing information use and disclosure specific to the system and program.	Budget and Accounting Procedures Act of 1950, 31 U.S.C. 3512; Executive Order 13520; and 5 U.S.C. 301.
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	No
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	
<b>PIA - 8B:</b>	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.	
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Government Sources Within the OPDIV Other HHS OPDIV
<b>PIA - 10:</b>	Is there an Office of Management and Budget (OMB) information collection approval number?	No
<b>PIA - 10A:</b>	Provide the information collection approval number.	
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	
<b>PIA - 10C:</b>	Explain why an OMB information collection approval number is not required.	Paperwork Reduction Act requirements do not apply as there are no forms in use by the system and no collection of information from members of the public.
<b>PIA - 11:</b>	Is the PII shared with other organizations outside the system's Operating Division?	No

<b>PIA - 11A:</b>	Identify with whom the PII is shared or disclosed.	
<b>PIA - 11B:</b>	Please provide the purpose(s) for the disclosures described in PIA - 11A.	
<b>PIA - 11C:</b>	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	
<b>PIA - 11D:</b>	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII. If no process or procedures are in place, please explain why not.	
<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
<b>PIA - 12A:</b>	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
<b>PIA - 13:</b>	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	The PII collected is used to track organizational payroll expenses to monitor and manage FDA's payroll costs. Because IBAPS receives data through other source systems, those systems are responsible for providing any opt-out option and process.
<b>PIA - 14:</b>	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 information in IBAPS comes directly from other systems. If a change occurs in the way PII is handled, individuals would be notified via the source system.
<b>PIA - 15:</b>	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.	<p>The information in IBAPS comes directly from other systems. If an individual has concerns regarding their PII, then the procedures for contacting source system authorities should be followed.</p> <p>Individuals have a number of avenues available to resolve the situation. Employees may submit concerns to their supervisor, FDA's Office of Financial Management, the FDA Privacy Office, the Employee Resource and Information Center (ERIC), and FDA's Cybersecurity and Infrastructure Operations Coordination Center (CIOCC). Contact information for these offices is available on the FDA intranet and internet.</p> <p>FDA personnel are required to report suspected and confirmed breaches of PII without delay to the FDA's CIOCC.</p>
<b>PIA - 16:</b>	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.	The source systems and operators are responsible for primary maintenance of PII integrity, accuracy, availability and relevancy. FDA loads payroll data (which contains PII) in IBAPS after each pay period through secure FTP. During this load, summary total cost is validated against detailed line items. When discrepancies are identified, FDA submits a request to the AFPS (Accounting For Pay System, owned and operated by HHS) to correct all discrepancies found. As designed by HHS, AFPS then transmits corrective actions to UFMS.

<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Users Administrators Developers Contractors
<b>PIA - 17A:</b>	Select the type of contractor.	HHS/OpDiv Direct Contractors
<b>PIA - 17B:</b>	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
<b>PIA - 18:</b>	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	<p>Users have access to this data to plan and project their payroll costs, to validate that the data meets budget expectations and ensure sufficient payroll funding is available.</p> <p>For system administration purposes such as pairing information from eHCM/CapHR and UFMS. Some of the administrators are Direct Contractors.</p> <p>For system development purposes. Some of the developers are Direct Contractors.</p> <p>Direct Contractors have access to this data for system administration and development work to address FDA's business needs.</p>
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	<p>All access to IBAPS requires supervisor approval prior to the user gaining access. System access is reviewed on a quarterly basis to identify and remove unnecessary accounts.</p> <p>Contractors need to go through Role Based Access Control (RBAC) process hosted by FDA Security to obtain access to the PII information. Contractors go through Public Trust Clearance to use the PII information.</p>
<b>PIA - 20:</b>	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.	Access for system administration is limited to a work need basis. Admins are subject to a higher-level background check. The access list and restrictions are reviewed on a quarterly basis during which time users' access permissions are reviewed/adjusted and unnecessary accounts and permissions are identified and removed or adjusted. RBAC required and elevated privilege PIV card supplied by HHS to access these systems.
<b>PIA - 21:</b>	Identify the general security and privacy awareness training provided to system users (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.	All system users at FDA take annual mandatory security and privacy awareness training. This training includes guidance on Federal laws, policies, and regulations relating to privacy and data confidentiality, integrity and availability, as well as the handling of data (including any special restrictions on data use and/or disclosure). The FDA Office of Information Management and Technology (OIMT) verifies that training has been successfully completed.
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	No additional system-specific training. Personnel may contact FDA's privacy staff for guidance.

**PIA - 23:**

Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).

The records in IBAPS are covered under the following National Archives and Records Administration (NARA) citations: General Records Schedule (GRS) 1.1: Financial Management and Reporting Records. Disposition-TEMPORARY. Records are destroyed 6 years after final payment or cancellation, a longer retention authorized if for business use. Otherwise destroy when business use ceases; GRS 1.2: Grant and Cooperative Agreement Records. Disposition- TEMPORARY. Records are destroyed 3 years after final action is taken on file.

**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.

Administrative safeguards include user training; system documentation that advises on proper use; implementation of Need to Know and Minimum Necessary principles when awarding access, and others.

Technical Safeguards include use of multi-factor access authentication, firewalls, and network monitoring and intrusion detection tools.

Physical controls include that all system servers are located at facilities protected by guards, locked facility doors, and climate controls.

Other appropriate controls have been selected from the National Institute of Standards and Technology's (NIST's) Special Publication 800-53, as determined using Federal Information Processing Standard (FIPS) 199.

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	2/11/2025
<b>Privacy Analyst Comments:</b>		<b>Privacy Analyst Days Open:</b>	

### SOP Review

<b>SOP Review Status:</b>	Approved	<b>SOP Signature:</b>	
<b>SOP Comments:</b>	The FDA's Senior Official for Privacy (SOP) has: (a) approved the Privacy Threshold Analysis (PTA)/Privacy Impact Assessment (PIA) conducted for the subject system/component; (b) reviewed and approved the associated security categorization; and (c) reviewed and confirmed acceptable implementation status of the assigned privacy controls.	<b>SOP Review Date:</b>	2/11/2025
		<b>SOP Days Open:</b>	0

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	2/13/2025
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Crystal Bland 2/13/2025 This PIA is ready for SAOP review and approval.	<b>Agency Privacy Analyst Days Open:</b>	2

### SAOP Review

<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	Archer Signature_Bridget Guenther.docx
<b>SAOP Comments:</b>		<b>SAOP Review Date:</b>	2/20/2025
		<b>SAOP Days Open:</b>	7

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
OC Integrated Budget and Acquisition Planning System_SOP Approved.rtf	760062	.rtf	2/11/2025 12:57 PM	0
PIA in Queue (OC Integrated Budget Acquisition Planning System).pdf	327531	.pdf	2/11/2025 12:57 PM	0

## Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	BLAND, CRYSTAL	2/11/2025	<p>Per FDA Email:</p> <p>There are 2 Archer issues impacting this PIA.</p> <ul style="list-style-type: none"> <li>The Answer to PTA-5A is entered on the PTA but does not show on the PIA.</li> <li>Yes, but the user credentials are maintained in a separate system (e.g., AD, AMS) and not collected or maintained by this system. The system providing credentials is <b>FDA Active Directory (AD)</b>.</li> </ul> <p>The PIA is also experiencing an Archer error with Question #3 of the general information.</p> <ul style="list-style-type: none"> <li>Q-3 "Does the system have or is it covered by a Security Authorization to Operate (ATO)?"</li> <li>The FDA instance of Archer is automatically entering the answer "No," which is incorrect. The ATO date is 3/6/2023.</li> <li>At this time, we are unable to update Archer to reflect the correct answer "Yes."</li> </ul> <p>The FDA Archer Team is aware of this occurrence and is working on a solution.</p>	

## Admin Section

Is OpDiv Privacy Analyst Approved ?:	1	Is OpDiv Privacy Analyst Return ? :	0
Is Agency Privacy Analyst Approve ?:	1	Is SOP Return ?:	0
Is SAOP Approved?:	1	Is Agency Privacy Analyst Return ?:	0
Total Approved:	4	Is SAOP Return ?:	0
Total Approval Required:	4	Total Return:	0

## Miscellaneous Fields

Last Updated:	2/20/2025 12:15 PM	History Log:	<a href="#">View History Log</a>
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