


General Information

PTA / PIA Name:	HRSA - HD 365 - QTR2 - 2025 - HRSA1437540	PTA / PIA ID:	3195079
Component Name:	HRSA - HRSA Dynamics 365	ATO Boundary Name:	HRSA Dynamics 365
Overall Status:	Complete 	# of Days - Open:	23
Submitter:		Submit Date:	5/15/2025
Next Assessment Date:	N/A	Expiration Date:	1/1/2100
Office:		OpDiv:	HRSA
Security Categorization:	Moderate		
Make PIA available to Public?:	No	PIA Required:	Yes
General 01:	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
General 02:	Is this a FISMA-Reportable system?		Yes
General 03:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
General 04:	ATO Date or Planned ATO Date.		7/5/2024
General 05:	Is the system or electronic information collection, agency or contractor operated?		Agency
History Log:	View History Log		

Privacy Threshold Analysis

Privacy Threshold Analysis

PTA 01:	Point of Contact (POC) Name	Srinivasa Mutthe
PTA 01A:	POC Title and Organization	Information System Owner
PTA 01B:	POC Email Address	smutthe@hrsa.gov
PTA 01C:	POC Phone Number	301-450-9060
PTA 02:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA 02A:	Describe in further detail any changes to the system that have occurred since the last PIA.	None
PTA 03:	Is the data contained in the system owned by the agency or contractor?	Agency

PTA 04:	Please give a brief overview of the purpose of the system by describing what the functions of the system are and how the system carries out those functions in support of HHS.	The Health Resources and Services Administration (HRSA) Dynamics 365 (HD365) is a system built to optimize HRSA's operations and strengthen program management to issue Notice of Funding Opportunity (NOFO) for grants. HD365 leverages Microsoft Dynamics 365 Power Apps Customer Relationship Management (CRM) application with configurations for HRSA's use. It features customized workflows and tasks designed to automate and monitor the review and approval process of HRSA grant announcements. Additionally, it facilitates revisions to the announcements before they are posted to the public.
PTA 05:	List and/or describe all the types of information that are collected, maintained, and/or shared by the system regardless of whether that information is PII and how long that information is stored.	HD365 is used to track and manage the review and approval process for grant announcements known as a Notice of Funding Opportunity (NOFO). The HD365 system collects NOFO details that include: funding opportunity numbers, funding opportunity names, grant dollar amounts, due dates, activity codes, approval dates, and additional details regarding the NOFO. The system uses HRSA Active Directory user information in order to control access to the system and communicate workflow steps. This information includes a users name, email address and phone number. This information is visible to all users and administrators and is not shared externally. The system collects add, edit and delete database transactional information and user logging information including date/time of logon for auditing purposes. This information is available only to admins and Division of Grants Policy (DGP) users and is not shared externally. All of the information collected in HD365 is stored, and not removed or deleted or shared.
PTA 05A:	Are user credentials used to access the system?	Yes
PTA 05B:	Please identify the type of user credentials used to access the system.	<p>HHS User Credentials</p> <p>HHS/OpDiv PIV Card</p> <p>HHS Email Address</p> <p>HHS Username</p> <p>Password</p>
PTA 06:	Describe why each type of information is collected, maintained, and/or shared by the system. Specify what information is collected about each category of individual.	<p>HD365 is used to track the process to manage, review and approve grant announcements known as a Notice of Funding Opportunity (NOFO). The NOFOs are permanently maintained in the system during and after the review process. The NOFO information stored by HD365 is not shared outside of the HD365 system.</p> <p>The HD365 system is connected to HRSA via Active Directory. All users of HD365 are HRSA organizational users. Access to HD365 is granted with a Microsoft Dynamics License, and an active HRSA Active Directory account. HD365 stores user information for both privileged (administrators) and non-privileged users. That user information is not shared externally.</p>
PTA 07:	Does the system collect, maintain, use, or share PII?	Yes

PTA 08:	Does the system include a website or online application?	Yes
PTA 08A:	Provide the URL(s).	https://hrsa-prod2.crm9.dynamics.com/
PTA 08B:	Are any of the website or online applications accessible by the public (including publicly accessible log in pages)?	No
PTA 09:	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.	<p>The Health Resources and Services Administration (HRSA) Dynamics 365 (HD365) is a web-based system built to optimize HRSA's operations and strengthen program management to issue Notice of Funding Opportunity (NOFO) for grants. HD365 leverages Microsoft Dynamics 365 Power Apps Customer Relationship Management (CRM) application with configurations for HRSA's use. It features customized workflows and tasks designed to automate and monitor the review and approval process of HRSA grant announcements. Additionally, it facilitates revisions to the announcements before they are posted to the public.</p> <p>The site is accessible by only HRSA organizational users.</p> <p>HRSA organizational users use both their HSPD-12 PIV and Personal Identification Number (PIN) and their HRSA Active Directory password to authenticate to HD365.</p>
PTA 10:	Does the website have a posted privacy notice?	No
PTA 11:	Does the website contain links to non-federal government websites external to HHS?	No
PTA 12:	Does the website use web measurement and customization technology?	No
PTA 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA 14:	Does the system have a mobile application?	No
PTA 20:	Are any third-party websites or applications (TPWA) associated with the system?	No
PTA 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

Privacy Impact Assessment

Privacy Impact Assessment

PIA 22:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Biographical Information Name User Credentials Contact Information Email Address (Business) Phone Numbers (Business)
PIA 23:	Indicate the categories of individuals about whom PII is collected, maintained, or shared.	Employees/HHS Direct Contractors
PIA 24:	Indicate the approximate number of individuals whose PII is maintained in the system.	100 – 499
PIA 25:	For what primary purpose is the PII used?	User identification and communication

PIA 26:	Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).	None
PIA 28:	Identify legal authorities, governing information use and disclosure specific to the system and program.	5 USC 301, Departmental Regulations.
PIA 29:	Are records in the system retrieved by one or more PII data elements?	No
PIA 30:	Identify the sources of PII in the system.	Government Sources Within the OPDIV
PIA 31:	Is there an Office of Management and Budget (OMB) information collection approval number?	No
PIA 31B:	Explain why an OMB information collection approval number is not required.	HD365 is not required to obtain an Office of Management and Budget (OMB) clearance number because it is used to publicize information on upcoming grants. The PII collected are only used for licensing, communication, authentication and authorization
PIA 32:	Is the PII in the system shared directly with other organizations outside the system's Operating Division?	No
PIA 33:	Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?	Voluntary
PIA 34:	Describe the method in place to notify and obtain consent from individuals whose PII will be collected. If no prior notice is given or consent cannot be obtained, explain why.	There is no option to opt out of providing full name, email address and group to the HD365. As this PII information is already being collected as part of their employment application and use to create a user account.
PIA 35:	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). If they cannot be notified or have their consent obtained, explain why.	Individuals are notified and consent during the hiring process.
PIA 36:	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.	The end user has the authority to make changes to information they've provide at any time by sending request to HRSA Office of Information Technology (OIT). In the event that PII or user credentials is inappropriately obtain or used the Network Operations Center (NOC) will notify the Information System Security Officer and Contracting Officer Representative (COR) . The COR will then send an email to the affected party to apprise them to incident.
PIA 37:	Describe the process in place for periodic reviews of the system to ensure the integrity, availability, accuracy, and relevancy of the PII in the system. Please address each element in your response. If no processes are in place, explain why not.	The system uses audit technology to track changes to the application and its data. HD365 Administrators review the audit logs frequently to insure the integrity, availability, accuracy and relevancy of the data. The end users can access their information using their credentials to assess and evaluate their stored information.
PIA 38:	Identify who will have access to the PII in the system.	Users Administrators Developers Contractors
PIA 38A:	Select the type of contractor.	HHS/OpDiv Direct Contractors

PIA 38B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
PIA 39:	Provide the reason why each of the groups identified in 38 needs access to PII.	Users - Review the NoFo and workflow contact processes. Administrators - Maintain, support, validate and verify the system. Developers - Develop, Maintain, support, validate and verify the system. Contractors - maintain, support, validate and verify the system.
PIA 40:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The users (administrators, developers, and contractors) are vetted through the HRSA background investigation process. Once they have been cleared through that process, the HD365 COR authorizes and approves request for access. The users receive access to the system for the sole purpose of the roles to the perform their functions.
PIA 41:	Describe the technical methods in place to allow those with access to PII to access only the minimum amount of information necessary to perform their job.	HD365 is a role based system. Reviewers are only able to create/edit/monitor/access information associated with their specific grant programs. The system administrators/developers use PII to maintain and enhance the system.
PIA 42:	Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) to make them aware of their responsibilities for protecting the information being collected and maintained.	All the internal users are required to complete HRSA annual security awareness training
PIA 43:	Describe the training system users receive above and beyond general security and privacy awareness training.	HRSA provides additional security and privacy training to significant users bases on their roles to handle PII and user credentials. In addition, users receive Incident Response training during contingency plan test.
PIA 44:	Describe the process and guidelines in place for the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).	System currently retains PII for licensing, communication, authentication and authorization. We are working with HRSA's Records Management Office, who are in turn working with National Archives and Records Administration (NARA) to obtain the appropriate records and retention schedule. Currently, the user information is retained indefinitely.

PIA 45:

Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.

HD365 is a Software as a Solution (SaaS) product. HRSA Dynamics inherits the FedRAMP ATO from Microsoft Dynamics which provide a standardized approach for assessing, monitoring, and authorizing cloud computing products and services under the Federal Information Security Management Act (FISMA). The physical control is achieved by storing the PII in the cloud. Administratively, only employees and contractors are given access to the system to avoid unauthorized access. These individuals have undergone a background and security investigation during the hiring process. As a technical control, a user must first enter email id in the login page using HRSA laptop which is connected to HRSA network. Microsoft then checks Dynamics 365 license and Security Privileges configured in HD365. Only then a user can access PII based on his role and/or privilege granted.

Review and Comments

OpDiv Privacy Analyst Review

Privacy Analyst Review Decision:	Approved	Privacy Analyst Review Date:	5/19/2025
Privacy Analyst Review Comments:		# of Days - PA Review:	4

SOP Review

SOP Review Decision:	Approved	SOP Review Date:	5/19/2025
SOP Review Comments:		# of Days - SOP Review:	0

Agency Privacy Analyst Review

Agency Privacy Analyst Review Decision:	Approved	Agency Privacy Analyst Review Date:	5/22/2025
Agency Privacy Analyst Review Comments:	Reviewer: Shanai Shobowale 5/22/2025 This PIA is ready for SAOP review and approval.	# of Days - APA Review:	3

SAOP Review

SAOP Review Decision:	Approved	SAOP Review Date:	5/30/2025
SAOP Review Comments:		# of Days - SAOP Review:	8

SAOP Signature

Date	User	Type	Name	Original Value	New Value
5/30/2025 11:16 AM	GUENTHER, BRIDGET	Signature	SAOP (Email PIN)		Content Signed

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
No Records Found				