


General Information		
PTA / PIA Name:	HRSA - SPO - QTR3 - 2025 - HRSA1446262	PTA / PIA ID: 3913419
Component Name:	HRSA - Microsoft SharePoint Online	ATO Boundary Name: Microsoft SharePoint
Overall Status:	Complete 	# of Days - Open: 232
Submitter:		Submit Date: 2/11/2026
Next Assessment Date:	02/25/2029	Expiration Date: 2/25/2029
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.	9/3/2024
General 05:	Is the system or electronic information collection, agency or contractor operated?	Contractor
History Log:	View History Log	

Privacy Threshold Analysis		
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PTA 01:	Point of Contact (POC) Name	Charles Benjamin
PTA 01A:	POC Title and Organization	ISSO and HRSA
PTA 01B:	POC Email Address	cbenjamin@hrsa.gov
PTA 01C:	POC Phone Number	301-945-3523
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.	Archer has been updated with a new combined PTA and PIA module.
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.

HRSA's Microsoft SharePoint Online system is a cloud-based software as a service (SaaS) offering hosted within the NIH/CIT Office 356 tenant under the Microsoft

Government Community Cloud (GCC). The system provides enterprise-wide collaboration and content management by allowing users to create, store, manage, and access information, documents, and files. The system provides advanced search capabilities for all content and metadata stored within the system and leverages role and permissions based access control to limiting access of content to only the individuals who require it. In addition to the content management, the system aids in staff productivity by providing data and workflow capabilities for automation of business processes.

The primary functions of HRSA's Microsoft SharePoint Online are to:

- 1) Provide an enterprise-wide solution for collaboration and content management, allowing users to create, store, manage, and access information, documents, and files.
- 2) Host both HRSA team sites (for collaboration) and the HRSA intranet for communication and dissemination of information.
- 3) Increase staff productivity and efficiency by providing the ability to automate existing manual business processes.
- 4) Provide secure storage of data via permissions-based access to limit access of content to only the individuals who require it.
- 5) Provide advanced search capabilities allowing users to quickly locate relevant information, documents and files.
- 6) Provide Section 508 compliance and support for records management for all content within the platform.

HRSA's Microsoft SharePoint Online system makes tools and services available to all employees and contractors within HRSA, empowering them with the ability to manage content (i.e., documents, information, and data), and to collaborate with others in order to support HRSA's mission.

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.

Name, Email Address (Business), and Phone number (Business)

PTA 05A:

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.

PTA 05C:	Please identify the system that maintains the user credentials or controls access to this system.	HHS User Credentials HHS/OpDiv PIV Card HHS Email Address
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.	HRSA Active Directory and National Institutes of Health Single Sign-On (NIH SSO). This data is collected for identity and authentication purposes to validate access to content.
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://nih.sharepoint.com/ https://intranet.hrsa.gov/ https://cfc.hrsa.gov/ http://itsupport.hrsa.gov https://spdevops.hrsa.gov
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.	The purpose of the websites is for collaboration and information sharing internal to HRSA. Personally Identifiable Information (PII) for non-identification and authorization and Personal Health Information (PHI) are not authorized to be stored in SharePoint Online (SPO). SPO provides an overarching framework for site owners to collect, share and maintain their information as per their specific business cases and responsible for the upkeep, records management, and monitoring of their information.
PTA 10:	Does the website have a posted privacy notice?	Yes
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?	Yes
PTA 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	Session Cookies- Does Not Collect PII Persistent Cookies- Does Not Collect PII
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 Contact Information Email Address (Business) Phone Numbers (Business)
PIA 23:	Indicate the categories of individuals about whom PII is collected, maintained, or shared.	Business Partners/Contacts (Federal state, local agencies) Employees/HHS Direct Contractors
PIA 24:	Indicate the approximate number of individuals whose PII is maintained in the system.	500 – 4,999
PIA 25:	For what primary purpose is the PII used?	PII is used to provide identification and authorization
PIA 26:	Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).	There are no secondary uses of PII.
PIA 28:	Identify legal authorities, governing information use and disclosure specific to the system and program.	Departmental Regulation 5 USC 301
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 Other HHS 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.	This is mandatory data for identification 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.	The HRSA SharePoint Online system serves as a collaboration platform and repository where each business component can store and maintain their own files and content. Access is controlled by Role Based Access controls (RBAC) which relies on the PII necessary to perform identification and authorization.
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.	The HRSA SharePoint Online system does not facilitate or directly conduct PII notification or consent activities. Additionally, SharePoint Online serves as a repository for standard file types, which may contain PII, and does not collect PII directly. Therefore, system changes do not typically affect PII disclosure and/or data uses.

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.	<p>If PII is inaccurate, the program or bureau/office where the information is collected is responsible for working with the individual(s) to edit or correct the PII.</p> <p>In cases where a suspected security or privacy incident has occurred (i.e., where PII may have been inappropriately obtained, used, or disclosed) it is the responsibility of the parties identifying the incident to report it in accordance with HRSA's Security and Privacy Incident handling policy and procedures.</p>
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.	Periodic reviews of PII contained in the HRSA SharePoint Online system are managed by the program or bureau/office where the information is collected and managed. The processes vary based on the information being collected and the program or bureau/office responsible for collecting and managing the PII.
PIA 38:	Identify who will have access to the PII in the system.	<p>Users</p> <p>Administrators</p> <p>Developers</p> <p>Contractors</p>
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.	<p>Users require access to add files and content and to enter and edit data in support of HRSA business needs, processes, and requirements.</p> <p>Administrators require access to be able to provide technical support for the programs and bureaus/office sites where the content is stored.</p> <p>Developers require access to be able to provide technical support for the HRSA SharePoint Online-based solutions that have been created for the programs and bureaus/offices.</p> <p>Contractors may be users, administrators, or developers.</p>

<p>PIA 40:</p>	<p>Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>Access is granted to HRSA SharePoint Online sites via SharePoint permissions management, which can leverage AD groups, SharePoint groups, and Microsoft 365 groups. The permissions and groups are managed by Site Owners within HRSA's programs and bureaus/offices, and permissions are applied in alignment with job duties and responsibilities of individual users.</p> <p>It is the responsibility of the Site Owners and content managers within HRSA's business components to determine and maintain the most appropriate access level for users accessing the sites.</p>
<p>PIA 41:</p>	<p>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.</p>	<p>HRSA SharePoint Online allows for permissions management to be applied by Site Owners to restrict PII data to only individuals who require access to perform their job duties. The system supports granting of unique permissions at site, library, folder, and item (i.e., document or list item) levels as needed.</p>
<p>PIA 42:</p>	<p>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.</p>	<p>HRSA Annual Cybersecurity Awareness Training.</p>
<p>PIA 43:</p>	<p>Describe the training system users receive above and beyond general security and privacy awareness training.</p>	<p>In addition to the annual HRSA Cybersecurity Awareness Training, HRSA provides SharePoint Online specific training courses that cover introductory, intermediate, and more advanced topics.</p>
<p>PIA 44:</p>	<p>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).</p>	<p>The SPO system itself follows GRS 3.1</p> <p>Applicable NARA General Records Schedules (GRS), Records Controls Schedules (RCS), and corresponding retention and destruction periods vary depending on the information types and the program and business needs under which the PII data is collected.</p>

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.

Data access is controlled via Role Based Access Control (RBAC) and is managed by the site owners and the SPO is responsible for adding site owners when a site is created. This leverages the SharePoint built-in access control features and the HRSA Active Directory (AD) for use of AD security groups and users. National Institutes of Health Single Sign-on (NIH SSO) is connected to the HRSA AD and acts as as the AD connection. SharePoint Online is a part of the NIH Tenancy.

Physical controls are provided by the Microsoft Data centers under the

Microsoft 365 Government Community Cloud & Supporting Services FedRAMP package MSO365MT

Review and Comments

OpDiv Privacy Analyst Review

Privacy Analyst Review Decision:	Approved	Privacy Analyst Review Date:	2/19/2026
Privacy Analyst Review Comments:		# of Days - PA Review:	8

SOP Review

SOP Review Decision:	Approved	SOP Review Date:	2/24/2026
SOP Review Comments:		# of Days - SOP Review:	5

Agency Privacy Analyst Review

Agency Privacy Analyst Review Decision:	Approved	Agency Privacy Analyst Review Date:	2/24/2026
Agency Privacy Analyst Review Comments:	<p>Reviewer: Christopher Akhibi</p> <p>2/24/2026 All comments have been addressed. This PIA is ready for SAOP review and approval.</p> <p>2/11/2026 Please see comments and update accordingly:</p> <p>PTA-5: Per PIA-1, please list the following PII in your response "Name, Email Address (Business), and Phone number (Business)."</p> <p>PTA-5C: Please provide the name of the system that manages the user credentials. Your response should be "HRSA Active Directory and National Institutes of Health Single Sign-On (NIH SSO) ."</p> <p>PIA-33: Please select "Voluntary" unless a federal law or executive order specifically imposes a requirement to furnish the information and provides a civil or criminal penalty for failure to do so. If furnishing the information is a condition for granting a benefit or privilege voluntarily sought by the individual, it is a voluntary submission.</p> <p>2/9/2026 Please see the comments and update accordingly:</p> <p>PIA-9: Please correct the spelling mistake for word "share".</p> <p>PIA-33: Change to "Voluntary"</p> <p>PIA-44: Please cite NARA specific #.</p>	# of Days - APA Review:	0

SAOP Review

SAOP Review Decision:	Approved	SAOP Review Date:	2/26/2026
SAOP Review Comments:		# of Days - SAOP Review:	2

SAOP Signature

Date	User	Type	Name	Original Value	New Value
2/26/2026 2:43 PM	BAUR, VANESSA	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
PTA 21	BLAND, CRYSTAL	1/14/2026	Microsoft Copilot is currently being evaluated in a pilot test.	
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PTA 21	AKHIBI, CHRISTOPHER	1/14/2026	Microsoft Copilot is currently being evaluated in a pilot test.	
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