


General Information

| | | | |
|---------------------------------------|---|---------------------------|-----------------------------------|
| PTA / PIA Name: | HRSA - OPTN-BCP - QTR4 - 2025 - HRSA1463417 | PTA / PIA ID: | 4247804 |
| Component Name: | HRSA - OPTN Board Collaboration Platform | ATO Boundary Name: | OPTN Board Collaboration Platform |
| Overall Status: | Complete  | # of Days - Open: | 53 |
| Submitter: | | Submit Date: | 2/4/2026 |
| Next Assessment Date: | 02/05/2029 | Expiration Date: | 2/5/2029 |
| Office: | | OpDiv: | HRSA |
| Security Categorization: | Moderate | | |
| Make PIA available to Public?: | Yes | PIA Required: | Yes |
| General 01: | Identify the Enterprise Performance Lifecycle Phase of the system. | | Development |
| General 02: | Is this a FISMA-Reportable system? | | No |
| General 03: | Does the system have or is it covered by a Security Authorization to Operate (ATO)? | | No |
| General 04: | ATO Date or Planned ATO Date. | | |
| General 05: | Is the system or electronic information collection, agency or contractor operated? | | Contractor |
| History Log: | View History Log | | |

Privacy Threshold Analysis

Privacy Threshold Analysis

| | | |
|-----------------|---|-------------------------------------|
| PTA 01: | Point of Contact (POC) Name | Ernest Boakye |
| PTA 01A: | POC Title and Organization | Information System Security Officer |
| PTA 01B: | POC Email Address | eboakye@hrsa.gov |
| PTA 01C: | POC Phone Number | 301-443-0413 |
| PTA 02: | Indicate the following reason(s) for this PTA. Choose from the following options. | New |
| 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 Organ Procurement and Transplantation Network (OPTN) Board Collaboration Platform (OPTN-BCP) will be a government-owned contractor operated system built entirely in the FedRamp Microsoft 365 Government Community Cloud (GCC) cloud environment. The purpose of this system is to achieve operational independence, transparency, and long-term sustainability for the OPTN's governance and collaboration infrastructure by centralizing existing disparate email communications, file storage (box.com), SharePoint, documentation, and collaboration, under one single secure M365 tenant. The Organ Procurement and Transplantation Network (OPTN) is a public-private partnership that links all professionals involved in the U.S. donation and transplantation system and this platform connects all OPTN stakeholders in one system to support the OPTN policy development and implementation process in accordance with HHS 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. | The system collects, maintains, and shares information (records) necessary for HRSA, OPTN board of directors, OPTN committees, OPTN volunteers, and OPTN contractors to support and facilitate OPTN policy development and implementation processes in accordance with HHS mission and as authorized by 42 U.S.C. 274a, 42 U.S.C., 274(b)(2)(H) and CFR part 121 and OPTN Management and Membership Policies and Bylaws. Information related to OPTN program and hospital evaluations, policy guidance development, strategic planning, management improvements, continuity of operations, service recovery, customer services, official information dissemination, public access to care, population health management and consumer safety, and healthcare information as it relates to OPTN overall mission is shared and collaborated between OPTN stakeholders within this OPTN-BCP system. All sensitive patient/donor information will be redacted prior to sharing or storing within this system. This system will collect, store, and share the following non-sensitive PII information of OPTN stakeholders to include name, work email, work address, and work phone numbers of all OPTN board members, OPTN committee members, OPTN board and committee contractors, HRSA employees, and OPTN-BCP system operators. |
| 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> <ul style="list-style-type: none"> HHS/OpDiv PIV Card HHS Email Address Password <p>Non-HHS User Credentials</p> <ul style="list-style-type: none"> Password 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. | OPTN-BCP will be used by the OPTN Board of Directors and Committees to support the OPTN policy development process and ensure patient safety and member compliance with OPTN policies and bylaws through review of monitoring reports (including audits, patient safety incidents, allocation reviews). OPTN Volunteer Directory – The SharePoint site will contain Volunteer Directory of all the individuals who are actively serving on the OPTN Board or one of the Committees or Ad Hoc workgroups. This Directory will contain the volunteers’ name, work address, work email address, work phone number. Monitoring Reports – The Membership and Professional Standards Committee (MPSC) and Board will review monitoring reports from Site Surveys and patient safety reviews. These documents will contain the name, work address, and the phone number of physicians, surgeons and clinicians. It will also contain patient information including name, Social Security number, truncated SSN, date of birth, medical information and sexual orientation. Any sensitive PII (SSN, DOB, Medical info, sexual orientation) info noted above will be redacted by another system / data custodian prior to this information being stored within OPTN-BCP. No sensitive PII will be stored or transit OPTN-BCP |
| 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://optn360.sharepoint.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. | The OPTN-BCP URL/Website will serve as the central collaboration site for OPTN Board Members, Board Contractors, Committee Members, Committee Member Contractors, OPTN Volunteers, HRSA Employees, and HRSA contractor responsible for operation of this cloud environment. The users must authenticate first through Microsoft EntraID with Multifactor Authentication (MFA) to enter the site to collaborate with each of the user groups mentioned above through Exchange Online, SharePoint Online, OneDrive, while also utilizing the other M365 applications such as MS. Word to create/review content. Only the user groups above have access to the collaboration site and tools and the site is not open to the general public. HRSA users will authenticate to this system through a B2B collaboration connection between HRSA tenant OPTN-BCP. HRSA users will use their Personal Identity Verification (PIV) card to authenticate locally to HRSA’s network. These credentials will be trusted and used to authenticate OPTN-BCP. |
| 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? | Yes |
| PTA 11A: | Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS? | Yes |
| 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 Contact Information Email Address (Business) Mailing 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 Vendors/Suppliers/Third-Party Contractors (Contractors other than 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? | Enabling collaboration and information sharing amongst OPTN Board, committee, and volunteers. PII is also needed to authenticate to the OPTN-BCP environment (Name, Email Address). |
| PIA 26: | Describe any secondary uses for which the PII will be used (e.g., testing, training, or research). | User Acceptance Testing |
| PIA 28: | Identify legal authorities, governing information use and disclosure specific to the system and program. | “National Organ Transplant Act (NOTA; P.L. 98-507), Securing the U.S. Organ Procurement and Transplantation Network Act, the Final Rule: eCFR :: 42 CFR Part 121 -- Organ Procurement and Transplantation Network, OPTN Management and Membership Policies - OPTN, OPTN Bylaws, |
| 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 Non-Government Sources Private Sector |
| 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. | PII data related to volunteer profile information will be uploaded by Board Contractor or collected through a form located within the OPTN-BCP. |
| 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. | OPTN-BCP committee members and Board and Committee contractors will be informed during their onboarding process how their PII data will be used (Name, Email, Address, Phone numbers) and stored within the OPTN-BCP to facilitate the collaboration and authentication process to the system. The individuals will need to consent to the collection of this information to log in and collaborate with OPTN-BCP members. Board support and committee support contractors will collect the PII info needed for the creation of their OPTN-BCP user access 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. | OPTN-BCP contractors will inform all system users via OPTN-BCP email if there is a material change in the way in which PII data is used or stored within the system. Board support and committee support contractors will need to collect the PII info needed for creation of user within OPTN-BCP. |
| 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. | A board member would inform the board support contractor, and a committee volunteer would contact the committee support contractor, who would make the appropriate changes to our membership directory. |
| 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 OPTN-BCP contractor responsible for safeguarding the PII data within the system will conduct quarterly audit reviews to ensure proper controls and permissions are implemented and operating as intended to ensure the integrity, availability, accuracy and relevancy of the PII data within the system. |
| 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 Third-Party Contractor (Contractors other than HHS 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>In order to collaborate you need to know a person's name, email address, and the other info needed for OPTN board, committees and volunteers to communicate. MPSC members and Board members need access to monitoring reports to ensure patient safety and member compliance with OPTN policies and bylaws.</p> <p>Administrators, developers, and contractors must know the users' name, email address, phone numbers, and address in order to provide support and communicate with OPTN users.</p> |
| PIA 40: | Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII. | This system only contains non-sensitive PII information, and all system users of all types will be able to see the names and contact information of other system users which represents all PII in this system. No administrative procedures are needed given there is no sensitive PII. |
| 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. | Microsoft EntraID, Intune, Defender, and Purview will collectively govern what PII info can be accessed in the OPTN-BCP. We are implementing Role Based Access Control (RBAC) and the principles of least privilege access. |
| 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. | OPTN Board and Committee volunteers will complete required security and privacy training prior to beginning their board or committee appointment. OPTN Board and Committee contractors will also complete required security and privacy training per their contracts with HRSA. Furthermore, users of the OPTN-BCP will review and acknowledge security and privacy policies and rules of behavior governing the use of the OPTN-BCP. |
| PIA 43: | Describe the training system users receive above and beyond general security and privacy awareness training. | Basic M365 Training, User interface training, Rules of Behavior, and Frequently Ask Questions (FAQs) |
| 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). | 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. |
| 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. | Microsoft EntraID, Intune, Defender, Purview, and Microsoft encryption standards will collectively secure and protect the PII elements in the system. Board and Committee contractor members will control access to PII information and other documentation through Role Based Access Controls. It's a SaaS system and all the physical protect are protected by Microsoft. |

Review and Comments

OpDiv Privacy Analyst Review

| | | | |
|---|--|-------------------------------------|----------|
| Privacy Analyst Review Decision: | Approved | Privacy Analyst Review Date: | 2/4/2026 |
| Privacy Analyst Review Comments: | <p>PTA-5 - please correct the misspelling (should be donor, not doner).</p> <p>PTA 4 >> please spell out GCC upon first use</p> <p>PTA 9 >> please spell out MFA and PIV upon first use</p> <p>PIA 28 >> Please review and verify if this is correct: << Stephanie "National Organ Transplant Act (NOTA; P.L. 98-507) >></p> | # of Days - PA Review: | 0 |

SOP Review

| | | | |
|-----------------------------|----------|--------------------------------|----------|
| SOP Review Decision: | Approved | SOP Review Date: | 2/5/2026 |
| SOP Review Comments: | | # of Days - SOP Review: | 1 |

Agency Privacy Analyst Review

| | | | |
|--|--|--|----------|
| Agency Privacy Analyst Review Decision: | Approved | Agency Privacy Analyst Review Date: | 2/6/2026 |
| Agency Privacy Analyst Review Comments: | <p>Reviewer: Crystal Bland</p> <p>2/6/2026 This PIA is ready for SAOP review and approval.</p> | # of Days - APA Review: | 1 |

SAOP Review

| | | | |
|------------------------------|----------|---------------------------------|----------|
| SAOP Review Decision: | Approved | SAOP Review Date: | 2/6/2026 |
| SAOP Review Comments: | | # of Days - SAOP Review: | 0 |

SAOP Signature

| Date | User | Type | Name | Original Value | New Value |
|---------------------|---------------|-----------|------------------|----------------|----------------|
| 2/6/2026 3:10 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 05 | Data Feed Service, pta_pia_HRSRA_Release | 1/8/2026 | misspelling - doner should be donor. | |
| PIA 29B | Data Feed Service, pta_pia_HRSRA_Release | 1/8/2026 | If records are retrieved by personal identifier, a SORN is required. Please work with the HRSRA Privacy Act Office (privacyact@hrsa.gov) to determine if a SORN is required to be completed. | |