


General Information		
PTA / PIA Name:	HRSA - Workiva - QTR3 - 2025 - HRSA1446279	PTA / PIA ID: 3706357
Component Name:	HRSA - WORKIVA	ATO Boundary Name: Workiva
Overall Status:	Complete 	# of Days - Open: 49
Submitter:		Submit Date: 7/11/2025
Next Assessment Date:	08/28/2028	Expiration Date: 8/28/2028
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.	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.	9/24/2027
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	Joseph Roach
PTA 01A:	POC Title and Organization	Director, Division of Financial Policy and Analysis
PTA 01B:	POC Email Address	jroach@hrsa.gov
PTA 01C:	POC Phone Number	301-594-4248
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.	No changes was made to the previous PTA/PIA. Guidance was provided by the HRSA Privacy team to update to the new PIA/PTA 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.	<p>Workiva is an automated software solution used by several Federal government agencies to support all aspects of the A-123 Internal Control workflow. Workiva is a central repository for all A-123 documentation such as Cycle Memos, Flow charts, control matrixes, test matrixes, etc., and offers an intuitive approach to share and re-use documentation amongst all A-123 participants. Additionally, Tableau has a built in connector with Workiva so all HRSA A-123 data can be shared for advanced data analytics. Workiva automates A123 Internal Controls testing manual processes (Cycle memos, test sheets, etc.) through emails and Shared Drive.</p> <p>New data type will be added into Workiva in support of Government Audit Management. Workiva Government Audit Management Software Solution for government agencies includes access to Audit Management Workspace for users involved in the internal audit management process and audit liaison process and the ability to add such users on an as-needed basis. The Audit Management Workspace enables the implementation of audit management in accordance with GAO-18-568G.</p> <p>The Provider Relief Bureau (PRB) is a program that helps health care providers in the United States prepare for, prevent, and respond to coronavirus. The PRB reimburses health care providers for lost revenue and expenses related to coronavirus, as well as claims reimbursement for health care entities for COVID-19 testing, treatment, and vaccine administration for uninsured and underinsured individuals. The PRB also oversees program integrity efforts and compliance. The Provider Relief Bureau administered four programs (PRF, ARP, UIP, CAF) and the audits will be focused on reviewing compliance to these programs.</p> <p>Workiva will create a collaborative workspace for HRSA employees, audit contractors, and providers (auditee) to enable the audit management process. Workiva is being utilized in PRB as a repository to collaborate on audit workpapers, to store and standardize audit documentation, and create audit reports. The Audit Management Workspace enables the implementation of audit management in accordance with GAGAS Yellow book audits.</p> <p>Furthermore, the system will establish a structured process for reviewing PRB payment and audit decisions, including reviewing PRB payment terms and conditions, providing project management and customer service support related to this process, and assisting with the compliance reviews and audit resolution associated with audit findings on PRB programs.</p> <p>These audit activities include reviewing claims</p>

		<p>data, financial statements, tax returns, general ledger data, and other source documentation. PRB's use of Workiva includes PII and PHI.</p>
PTA 05:	<p>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.</p>	<p>Tax Identification for providers, Point of Contacts, DOBs, Patient Info, PHIs (health records, address, personal health history, lab results, ID cards family, vaccination records).</p> <p>Financial information, including financial statements, general ledgers, bank statements, tax returns, Medicare/Medicaid reports, and billing and collection reports. Documentation is maintained in accordance with the NARA regulations unless involved in civil or legal proceedings.</p>
PTA 05A:	<p>Are user credentials used to access the system?</p>	<p>Yes, but the user credentials are maintained in a separate system (e.g., AD, AMS) and not collected or maintained by this system.</p>
PTA 05C:	<p>Please identify the system that maintains the user credentials or controls access to this system.</p>	<p>Okta</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>Tax Identification for providers, Point of Contacts, DOBs, Patient Info, PHIs (health records, address, personal health history, lab results, ID cards family, vaccination records).</p> <p>Financial information, including financial statements, general ledgers, bank statements, tax returns, Medicare/Medicaid reports, and billing and collection reports. Documentation is maintained in accordance with the NARA regulations unless involved in civil or legal proceedings.</p> <p>HRSA distributed Provider Relief Bureau (PRB) funds. Program Recipients agreed to the Provider Relief Bureau Program Terms and Conditions, which require compliance with reporting requirements as specified by the Secretary of the U.S. Department of Health and Human Services (HHS). HRSA will conduct audits for recipients who received funding. We will be required to review the documentation listed above.</p> <p>HRSA will utilize the system to comply with the requirements listed below:</p> <p>The Recipient shall maintain appropriate records and cost documentation including, as applicable, documentation described in 45 CFR § 75.302 – Financial management and 45 CFR § 75.361 through 75.365 – Record Retention and Access, and other information required by future program instructions to substantiate the reimbursement of costs under this award. The Recipient shall promptly submit copies of such records and cost documentation upon the request of the Secretary, and Recipient agrees to fully cooperate in all audits the Secretary, Inspector General, or Pandemic Response Accountability Committee conducts to ensure compliance with these Terms and Conditions.</p>
PTA 07:	Does the system collect, maintain, use, or share PII?	Yes
PTA 08:	Does the system include a website or online application?	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

PIA 22:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	<p>Identifying Numbers</p> <ul style="list-style-type: none"> Taxpayer ID Number (TIN) Driver’s License Number <p>Biographical Information</p> <ul style="list-style-type: none"> Name Date of Birth <p>Contact Information</p> <ul style="list-style-type: none"> Mailing Address (Personal) <p>Medical Information</p> <ul style="list-style-type: none"> Medical Records Medical Records Number
PIA 23:	Indicate the categories of individuals about whom PII is collected, maintained, or shared.	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.	500 – 4,999
PIA 25:	For what primary purpose is the PII used?	<p>To conduct audits and assessment to verify compliance with HRSA program Terms and Conditions (T&Cs) to which organization attested, as well as other legal requirements. The Health Resources and Services Administration (HRSA) COVID-19 Claims Reimbursement to Health Care Providers and Facilities for Testing, Treatment, and Vaccination Administration for the Uninsured Program (UIP) provides claims reimbursement to eligible health care providers for conducting COVID-19 testing for the uninsured, treating uninsured individuals with a primary COVID-19 diagnosis and administering FDA-authorized or licensed COVID-19 vaccines to uninsured individuals.</p> <p>In accordance with your organization’s participation as a recipient in UIP, HRSA contracted with Creative Solutions Consulting Inc. (CSCI) to conduct an assessment to verify compliance with UIP Terms and Conditions (T&Cs) to which your organization attested, as well as other legal requirements. This assessment helps to ensure appropriated taxpayer dollars were spent in accordance with the mission and objectives of the program.</p>
PIA 26:	Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).	Not Applicable.

PIA 27:

Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID. If the Taxpayer IDs collected are only for businesses include that in your response.

Determine whether the PRF disbursements were used in accordance with the Terms and Conditions (T&Cs).

Confirm funds were used for health care-related expenses and lost revenues attributable to coronavirus.

Confirm the health care-related expenses or lost revenues reimbursed by PRF were not reimbursed or obligated to be reimbursed from other sources,

Identify any misused funds which would need to be returned to HRSA.

HRSA conducts assessments to:

Verify claims are properly reimbursed to requesting providers in accordance with program policy and the T&Cs. (See Appendix 1)

Verify the claimant is eligible to receive reimbursement for testing, treatment, or vaccine administration of individuals as set forth in the T&Cs.

Verify the claimant engaged in balance billing or charge any type of cost-sharing for any items or services provided to Individuals receiving a COVID-19 testing, treatment, or vaccination for which the recipient receives a payment from the Provider Relief Fund.

Verify the claimant who received reimbursement from the program also did not receive reimbursement for such vaccine administration from any other individual (patients) or other source, including the Uninsured Program.

Identify any misused funds which would need to be returned to HRSA.

HRSA processes PII/PHI for the following reasons:

HRSA is required to process PII/PHI when conducting audits and assessments to determine whether the Provider is in compliance with the program requirements.

HRSA distributed Provider Relief Bureau (PRB) funds. Program Providers agreed to the Provider Relief Bureau Program Terms and Conditions, which require compliance with reporting requirements as specified by the Secretary of the U.S. Department of Health and Human Services (HHS). HRSA will conduct audits for providers who received funding.

PIA 27A:

Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID. If the Taxpayer IDs collected are only for businesses, you may respond N/A.

Privacy Act – 5 U.S.C. 552a that regulates the collection, maintenance, use, and dissemination of PII by Federal Executive Branch Agencies.

CARES Act (P.L. 116-136) - Provided fast and direct economic assistance for American workers, families, small businesses, and industries.

PPHCE Act (P.L. 116-139) - Provided \$484 billion in additional funding to replenish and supplement key programs under the CARES Act, including the Paycheck Protection Program (PPP), small business disaster loans and grants, hospitals and health care providers and testing.

CRRSA Act (P.L. 116-260) - In response to the 2019 Novel Coronavirus (COVID-19) the U.S. Congress passed the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSA Act), which was enacted on December 27, 2020

ARP Act (P.L. 117-2) - Provided critical and unprecedented support to children, families, and communities in response to the COVID-19 pandemic and resulting economic downturn, which was exacerbated by historic racial injustices.

FFCRA (P.L. 116-127) - Required certain employers to provide employees with paid sick leave or expanded family and medical leave for specified reasons related to COVID-19.

Title 45, Chapter A, Part 75 of the Code of Federal Regulations - The Recipient shall maintain appropriate records and documentation including, as applicable, documentation.

NARA – Guidance on Managing Records in Cloud Computing Environments. HHS Retention Guidelines: §75.361 through §75.365 (Record Retention and Access) and other NARA regulations.

PIA 28:	Identify legal authorities, governing information use and disclosure specific to the system and program.	<p>Privacy Act – 5 U.S.C. 552a that regulates the collection, maintenance, use, and dissemination of PII by Federal Executive Branch Agencies.</p> <p>CARES Act (P.L. 116-136) - Provided fast and direct economic assistance for American workers, families, small businesses, and industries.</p> <p>PPHCE Act (P.L. 116-139) - Provided \$484 billion in additional funding to replenish and supplement key programs under the CARES Act, including the Paycheck Protection Program (PPP), small business disaster loans and grants, hospitals and health care providers and testing.</p> <p>CRRSA Act (P.L. 116-260) - In response to the 2019 Novel Coronavirus (COVID-19) the U.S. Congress passed the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSA Act), which was enacted on December 27, 2020.</p> <p>ARP Act (P.L. 117-2) - Provided critical and unprecedented support to children, families, and communities in response to the COVID-19 pandemic and resulting economic downturn, which was exacerbated by historic racial injustices.</p> <p>FFCRA (P.L. 116-127) - Required certain employers to provide employees with paid sick leave or expanded family and medical leave for specified reasons related to COVID-19.</p> <p>Title 45, Chapter A, Part 75 of the Code of Federal Regulations - The Recipient shall maintain appropriate records and documentation including, as applicable, documentation.</p> <p>NARA – Guidance on Managing Records in Cloud Computing Environments. HHS Retention Guidelines: §75.361 through §75.365 (Record Retention and Access) and other NARA regulations.</p>
PIA 29:	Are records in the system retrieved by one or more PII data elements?	Yes
PIA 29A:	Please specify which PII data elements are used to retrieve records.	DOB, Names and Address to retrieve data.
PIA 29B:	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.	Workiva personnel are working with the HRSA Privacy Act group on a SORN determination.
PIA 30:	Identify the sources of PII in the system.	<p>Non-Government Sources</p> <p>Private Sector</p>
PIA 31:	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes
PIA 31A:	Provide the information collection approval number(s) and expiration date(s).	OMB Memorandum 03-22, OMB No. 0906-0068; 2/28/2025
PIA 32:	Is the PII in the system shared directly with other organizations outside the system’s Operating Division?	Yes
PIA 32A:	Identify with whom the PII is shared or disclosed.	Private Sector

PIA 32B:

For each disclosure, name the organizations/systems the system shares PII with and the purpose(s) of the disclosure.

Determine whether the PRF disbursements were used in accordance with the Terms and Conditions (T&Cs).

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<p>PIA 32C:</p>	<p>List any agreements in place that authorize the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).</p>	<p>https://www.federalregister.gov/documents/2022/09/21/2022-20359/agency-information-collection-activities-submission-to-omb-for-review-and-approval-public-comment.</p> <p>HRSA establishes policies for routine use by publishing them in the Federal Register. Please reference OMB No. 0906-0068</p> <p>CARES Act (P.L. 116-136) - Provided fast and direct economic assistance for American workers, families, small businesses, and industries.</p>
<p>PIA 32D:</p>	<p>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.</p>	<p>Contract Auditor – Is responsible for collecting personal information, modifying collected information, reviewing information, and assessing whether collected information meets the programs objectives. The contract auditor is responsible for notifying Providers of the audit, what documentation is needed, how that documentation will be used, and who they can contact for further information.</p> <p>Providers-The Recipient shall promptly submit copies of such records and cost documentation upon the request of the Secretary, and Recipient agrees to fully cooperate in all audits the Secretary, Inspector General, or Pandemic Response Accountability Committee conducts to ensure compliance with these Terms and Conditions.</p>
<p>PIA 33:</p>	<p>Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?</p>	<p>Mandatory</p>
<p>PIA 33A:</p>	<p>If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.</p>	<p>CARES Act (P.L. 116-136) - Provided fast and direct economic assistance for American workers, families, small businesses, and industries.</p>
<p>PIA 34:</p>	<p>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.</p>	<p>Providers are provided HRSA Programs Terms and Conditions, once signed there are no means to opt-out after 90 days. Per the HRSA Program "terms and Conditions " If you receive a payment from funds appropriated in the Public Health and Social Services Emergency Fund for provider relief ("Relief Fund") under Public Law 116-136 and retain that payment for at least 90 days without contacting HHS regarding remittance of those funds, you are deemed to have accepted the following Terms and Conditions. Please also indicate your acceptance below. This is not an exhaustive list and you must comply with any other relevant statutes and regulations, as applicable.</p>
<p>PIA 35:</p>	<p>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.</p>	<p>HRSA Privacy team in coordination with HRSA IT will notify individuals/business/providers in the event of a system change. In the event of a suspected or confirmed privacy breach HHS and OpDiv privacy and information security experts will provide guidance.</p>

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.	There are no means to inappropriately obtain PII, or provided PII are at will by the businesses/individual/providers.
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.	<p>Contract Auditor – Is responsible for collecting personal information, modifying collected information, reviewing information, and assessing whether collected information meets the programs objectives. The contract auditor is responsible for notifying Providers of the audit, what documentation is needed, how that documentation will be used, and who they can contact for further information. Contractor privileges are formally authorized and controlled and allocated on a need -to-use and event-by-event basis for their function, and documented for each system product/element.</p> <p>HRSA PRB – PRB is responsible for determining what is collected and how the PII/PHI will be used and how long the data is kept within Workiva. PRB performs a review of all documentation that auditors prepare in accordance with Op-Div defined requirements and restricts the use of PII/PHI for the purposes outlined in our program’s terms and conditions.</p> <p>HRSA Senior Privacy Official - The responsibilities of the Senior Privacy Official include the following:</p> <p>Ensuring that all HRSA systems comply with the Privacy Act and other federal regulations and maintaining HRSA privacy policies;</p> <p>Maintaining a system of records notice (SORN) for all HRSA systems that contain Personally Identifiable Information (PII);</p> <p>Ensuring that all HRSA systems conduct privacy impact assessments (PIA) on in accordance with the E-Government Act of 2002, OMB Memorandum 03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, and the HHS Information Security Program Privacy Impact Assessment Guide</p> <p>Others</p>
PIA 38:	Identify who will have access to the PII in the system.	Others
PIA 38C:	Identify the additional person(s) who will have access to the PII in the system not mentioned in the list above.	N/A
PIA 39:	Provide the reason why each of the groups identified in 38 needs access to PII.	Groups mentioned above all participate in audits and assessment process per HRSA Programs Terms and Conditions.

<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>All accounts are required to be requested through an Organizational User Administrator for the HRSA instance of the Workiva platform. The Organization User Administrator is appointed by the System Owner. The request and approval processes are outlined below. The Organization User Administrator perform the daily functionality of the system The Organizational User Administrator (at the instruction of the System Owner) can approve account requests for known users with a valid reason for access. The Organization User Administrator shall request additional approval from the user’s manager if the user requesting the access is unknown or if it is unclear on the reason for the access.</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>The Workiva platform provides roles to grant access for user account management and security configuration management.</p> <p>Organizational User Administrators for the HRSA instance of the Workiva platform must follow the conditions and steps below to grant access to users. This is to ensure that the conditions are met for the role and permissions, the access is approved by the right individual. After the conditions have been reviewed and the proper approval process has been completed, the account can be created or updated.</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>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.</p> <p>All employees must complete Cybersecurity Awareness Training computer-based training course on privacy and security requirements within 30 days of hire and an annual refresher course thereafter.</p>
<p>PIA 43:</p>	<p>Describe the training system users receive above and beyond general security and privacy awareness training.</p>	<p>Workiva Audit Management Onboarding Course. Before beginning any audit work, please complete this simple training program to get your bearings and familiarize yourself with this system. It introduces the system, general functionality, & workflows.</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>NARA – Guidance on Managing Records in Cloud Computing Environments. HHS Retention Guidelines: §75.361 through §75.365 (Record Retention and Access) and other NARA regulations.</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.	All users authenticate through AMS via two factor authentication. Data is uploaded from GFE or VDI into Workiva. HRSA Users login to Workiva using PIV and download the relevant files onto GFEs/VDIs and upload in Workiva and perform analysis. All data are encrypted per HRSA encryption policy.
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Review and Comments

OpDiv Privacy Analyst Review

Privacy Analyst Review Decision:	Approved	Privacy Analyst Review Date:	7/25/2025
Privacy Analyst Review Comments:		# of Days - PA Review:	14

SOP Review

SOP Review Decision:	Approved	SOP Review Date:	8/25/2025
SOP Review Comments:		# of Days - SOP Review:	31

Agency Privacy Analyst Review

Agency Privacy Analyst Review Decision:	Approved	Agency Privacy Analyst Review Date:	8/28/2025
Agency Privacy Analyst Review Comments:	Reviewer: Crystal Bland 8/28/2025 Had minor comments for updates to the next iteration of the PTA/PIA. This PIA is ready for SAOP review and approval.	# of Days - APA Review:	3

SAOP Review

SAOP Review Decision:	Approved	SAOP Review Date:	8/29/2025
SAOP Review Comments:		# of Days - SAOP Review:	1

SAOP Signature

Date	User	Type	Name	Original Value	New Value
8/29/2025 1:41 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
PIA 22	BLAND, CRYSTAL	8/28/2025	Per PTA-5 please check "Financial Account Information" as one of the PII elements collected.	
PTA 05	BLAND, CRYSTAL	8/28/2025	Per PIA-22, please include "Driver License" as one of the PII elements collected.	
PTA 01	BLAND, CRYSTAL	8/28/2025	Attached Approved PIA.	HRSA - Workiva - QTR2 - 2023 - HRSA983224_09182024 Approved.rtf