





## 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>	OS - ASFR PRIMS - QTR1 - 2025 - OS2311299	<b>PIA ID:</b>	2968838
<b>Name of Component:</b>	OS - ASFR Present Responsibility and Integrity Management System	<b>Name of ATO Boundary:</b>	OS ASFR Data Analytics Systems
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	88
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	3/18/2025
<b>Next Assessment Date:</b>	N/A	<b>Expiration Date:</b>	4/14/2028
<b>Office:</b>		<b>OPDIV:</b>	OS
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	OS2311299
<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.		6/23/2025
<b>5:</b>	Is the system or electronic information collection, agency or contractor operated?		Contractor

## PTA

### PTA

<b>PTA - 2:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.	New
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	
<b>PTA - 3:</b>	Is the data contained in the system owned by the agency or contractor?	Agency
<b>PTA - 4:</b>	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.	<p>The ASFR Present Responsibility and Integrity Management System (ASFR PRIMS) is a case management system utilized by the U.S. Department of Health and Human Services (HHS), Office of the Assistant Secretary for Financial Resources (ASFR), Office of Acquisitions (OA), Office of Recipient Integrity Coordination (ORIC) to improve the efficiency, cost-savings, and timeliness of completing suspension and debarment (S&amp;D) actions for ORIC staff and its collaborating reviewing agencies. ASFR PRIMS is driven by a mission and business need to manage and increase the efficiency of the S&amp;D process by assisting staff in managing the inordinate volume of data and administrative processes required to prepare recommendations to the Suspension and Debarment Official (SDO).</p> <p>The system serves as a central repository for uniform data collection of referrals, final</p>

determinations, decisions, and correspondence within and among ORIC staff, its referring entities, and respondents. A critical component of ASFR PRIMS is its ability to track and report agency S&D actions, satisfying congressional reporting requirements. It establishes basic system functionality for ORIC staff, specifically, the analysts and the Director. As new information is discovered, it is critical that documentation for each case is reviewed, managed, and maintained in a central location to determine its impact on recommendations to the SDO.

ASFR PRIMS provides a wide range of capabilities for managing cases, including creating and updating referrals, viewing case summaries, managing checklists for analysts, and tracking actions taken by analysts. Users can update timelines, assign, or reassign cases to analysts, extend deadlines, and create or assign peer reviews. Additional functionalities include coordinating with lead agencies, notifying respondents, updating mail receipt notices, exporting case data to Microsoft (MS) Excel, and managing respondents (adding, editing, or removing). Users can also manage attorney information, add comments, open or close cases, and oversee case documents. The system supports adding case affiliations, updating imputation information, and managing administrative agreements. It also allows for document management with prefilled templates and provides a read-aloud feature for specific documents.

Users can view cases assigned as a respondent, respond to questions, and upload supporting documentation to ORIC. They can also view messages from ORIC, request Present Matters in Opposition (PMIO), and submit supporting documentation if administrative action is taken. Users can submit referral information and additional documentation to ORIC as requested. They can send and receive communications regarding cases with ORIC and view the status of all cases within their office. Users can also review and comment on case documents, view assigned cases, and update case information. Users can view and filter a list of assigned cases on the home page, search cases by number, respondent, or analyst name, and search for respondents by first or last name. They can also view SDO metrics, generate front office reports from ASFR PRIMS, and search audit and certified mail information across all cases.

<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.	Personally identifiable information (PII) collected and maintained by ASFR PRIMS involves users, respondents, and entities involved in cases. User information includes name, email address, and username. Case respondent information includes name, email address, mailing address, phone number, Federal Bureau of Prisons (BOP) Register Number, and Unique Entity Identifier (UEI). The system also collects and maintains respondent case information including case summary, case updates, and supporting documentation. The aforementioned information is stored indefinitely.
<b>PTA - 5A:</b>	Are user credentials used to access the system?	Yes
<b>PTA - 5B:</b>	Please identify the type of user credentials used to access the system.	HHS User Credentials HHS Username Password
<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.	ASFR PRIMS user types consist of the Director, S&D Analyst, and Administrator. The information collected for the Director, S&D analysts, and administrators includes name, email address, and username. The aforementioned information is collected into and maintained by ASFR PRIMS to create user accounts for access to the application. Case respondents consist of individuals, companies, and attorneys. The information collected for individuals includes name, email address, mailing address, BOP Register Number, case summary information, and supporting documentation.  The information collected for companies includes company name, email address, mailing address, company UEI, case summary information, and supporting documentation. The information collected for attorneys includes name, email address, mailing address, and phone number. The aforementioned information is collected into and maintained within ASFR PRIMS case files to support the risk management framework (RMF), ensuring that HHS awards are provided to the responsible entities. ASFR PRIMS enables users to create a case for the respondent and make edits or updates to the case summary when necessary. No information is shared outside of the system.
<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)?	Yes
<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 ASFR PRIMS website is to manage the HHS/ASFR S&D case management workflow. The website was designed to assist analysts, directors, and leadership with working on cases and maintaining respondent information.
<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?	Yes
<b>PTA - 12A:</b>	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
<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**

**PIA**

<p><b>PIA - 1:</b></p>	<p>Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.</p>	<p>Truncated SSN  Name  Email Address  Phone numbers  Education Records  Vehicle Identifiers  Mailing Address  Employment Status  User Credentials  Driver License Number  Other - Free text Field - Unique Entity Identifier (UEI), Federal Bureau of Prisons (BOP) Register Number</p>
<p><b>PIA - 2:</b></p>	<p>Indicate the categories of individuals about whom PII is collected, maintained or shared.</p>	<p>Employees/ HHS Direct Contractors  Grantees  Members of the public  Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)</p>
<p><b>PIA - 3:</b></p>	<p>Indicate the approximate number of individuals whose PII is maintained in the system.</p>	<p>201 - 500</p>
<p><b>PIA - 4:</b></p>	<p>For what primary purpose is the PII used?</p>	<p>The primary purpose of collecting personally identifiable information (PII) within the Office of the Assistant Secretary for Financial Resources Present Responsibility and Integrity Management System (ASFR PRIMS) is to establish case details for respondents. When a case is initially created, the respondent's name, email address, and mailing address are collected. This PII is stored in the case summary and remains within ASFR PRIMS, even after the case is closed or deleted. The system utilizes this information primarily to classify case types, track status updates, and manage actions related to the case. Additionally, collecting this PII enables the Department of Health and Human Services (HHS) to contact respondents involved in the cases and ensure that legal notice requirements are met.</p>
<p><b>PIA - 5:</b></p>	<p>Describe any secondary uses for which the PII will be used (e.g. testing, training or research).</p>	<p>N/A</p>

<b>PIA - 6:</b>	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	The Truncated Social Security number (SSN) is utilized as part of a central entity registry. This registry is maintained to provide a standard code to uniquely identify entities, including individuals, together with mailing address and other characteristic data to all principal operating components, agencies, regional offices, and staff offices of the Department. The use of a single code per entity in all Departmental data systems enhances communication with an entity, as well diminishing the need to maintain duplicative data and files at various locations. Major categories of entities in the central file are those awarded contracts and awarded grants under Federal Domestic Assistance programs. Only those persons in the Department with a "need to know" have access to the published registry and to the automated records.
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	The collection of PII necessary for operating ASFR PRIMS is permitted under United States Code (U.S.C.), 5 U.S.C. 301 as denoted within the SORN (09-90-0025), which authorizes the Secretary of HHS to prescribe regulations for the government of his or her department, the conduct of its employees, the distribution and performance of its business, and the custody, use, and preservation of its records, papers, and property.
<b>PIA - 7:</b>	Identify legal authorities governing information use and disclosure specific to the system and program.	The collection of PII necessary for operating ASFR PRIMS is permitted under 5 U.S.C. 301, which authorizes the Secretary of HHS to prescribe regulations for the government of his or her department, the conduct of its employees, the distribution and performance of its business, and the custody, use, and preservation of its records, papers, and property.
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	Yes
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	Records in ASFR PRIMS are retrieved utilizing a respondent's first and last name.
<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.	ASFR PRIMS is covered under System of Records Notice (SORN) 09-90-0025 Central Registry of Individuals Doing Business with HHS  <a href="https://www.hhs.gov/foia/privacy/sorns/09900025/index.html">https://www.hhs.gov/foia/privacy/sorns/09900025/index.html</a>

<b>PIA - 9:</b>	Identify the sources of PII in the system.	<p>Directly from an individual about whom the information pertains</p> <ul style="list-style-type: none"> <li>In-person</li> <li>Phone</li> <li>Email</li> <li>Online</li> <li>Other</li> </ul> <p>Government Sources</p> <ul style="list-style-type: none"> <li>Within the OPDIV</li> <li>Other HHS OPDIV</li> <li>State/Local/Tribal</li> <li>Other Federal Entities</li> </ul> <p>Non-Government Sources</p> <ul style="list-style-type: none"> <li>Members of the Public</li> <li>Commercial Data Broker</li> <li>Public Media/Internet</li> <li>Private Sector</li> </ul>
<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.	ASFR PRIMS is a new information system, an Office of Management and Budget (OMB) information collection approval number does not currently exist. An information collection approval request will be submitted.
<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.	There is no option for individuals to object to the collection of PII. Respondent information is obtained from publicly available sources available to HHS once they receive federal funding. ASFR personnel are aware of what PII is collected, their information is supplied voluntarily. The use of this information is essential in managing suspension and debarment (S&D) actions, and therefore, is consistent with their expectations.
<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.	No major changes are anticipated that would affect the collection and use of an individual's PII. If a major change were to occur within ASFR PRIMS that would affect the rights and interests of individuals, that change will be communicated via email notification and/or updates to the SORN.
<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.	To correct inaccurate information within ASFR PRIMS, individuals can contact the Office of Recipient Integrity Coordination (ORIC). If an individual believes their PII has been inappropriately obtained, used, or disclosed, they can contact the Operating Division (OpDiv) Computer Security Incident Response Team (CSIRT) or the HHS Computer Security Incident Response Center (CSIRC) if they are unable to contact their local CSIRT or Help Desk.
<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.	ASFR PRIMS relies on personnel to ensure the integrity and accuracy of PII contained in the system. ASFR personnel are responsible for providing accurate information and may update or correct the information as required. As part of the process of obtaining and maintaining an Authorization to Operate (ATO), The system goes through periodic assessments to ensure the integrity, availability, accuracy, and relevancy of PII. Security impact analyses (SIAs) are conducted for all system changes. Integrity and relevancy of PII are evaluated as part of the change control process. Accuracy and availability of PII is ensured during functional and user acceptance testing. The integrity and availability of PII contained within ASFR PRIMS is also protected by the applicable National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 security and privacy controls commensurate with its Federal Information Processing Standard (FIPS) 199 security categorization.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Users Administrators Developers
<b>PIA - 17A:</b>	Select the type of contractor.	
<b>PIA - 17B:</b>	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	

<p><b>PIA - 18:</b></p>	<p>Provide the reason why each of the groups identified in PIA - 17 needs access to PII.</p>	<p>Users: Require access to PII for the purpose of notifying respondents per Code of Federal Regulations (CFR) 2 CFR Part 180 - OMB Guidelines to Agencies on Government-Wide Debarment and Suspension (Nonprocurement) and Federal Acquisition Regulation (FAR) Subpart 9.4 - Debarment, Suspension, and Ineligibility.</p> <p>Administrators: Require access to PII for the purposes of conducting system operations and maintenance, as well as establishing and managing user accounts.</p> <p>Developers: Require access to PII for the purposes of conducting system operations and maintenance, as well as providing technical assistance.</p>
<p><b>PIA - 19:</b></p>	<p>Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>ASFR PRIMS users have varying degrees of privileges and responsibilities related to PII. The system limits access to PII based on their role within HHS. Access to PII is provided on a need-to-know basis and limited to authorized personnel only. Role-based restrictions permit access to information that is required for individuals to perform their job functions.</p>
<p><b>PIA - 20:</b></p>	<p>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.</p>	<p>Role-based privileges, implemented within ASFR PRIMS, is the technical method utilized to allow those with access to PII to only access the information necessary to perform their job. There is one role in the system with special permission, the System Administrator. The system restricts privileged account access to this role. All other roles restrict the execution of privileged functions. Users with the System Administrator role can enable/disable other user accounts and add or delete permission set groups for an existing user account.</p>
<p><b>PIA - 21:</b></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>To ensure awareness of their responsibilities for protecting the information being collected and maintained, system users (system owners, managers, operators, contractors and/or program managers) are required to complete the HHS Cybersecurity Awareness Training prior to accessing ASFR PRIMS and annually thereafter. AFSR verifies that mandatory security and privacy awareness training has been successfully completed.</p>
<p><b>PIA - 22:</b></p>	<p>Describe the training system users receive (above and beyond general security and privacy awareness training).</p>	<p>In addition to general security and privacy awareness training, system users (system owners, managers, operators, contractors and/or program managers) are required to read and acknowledge the HHS Rules of Behavior (RoB) for General Users prior to accessing ASFR PRIMS and annually thereafter. Records management training and role-based training for system administrators are also required annually. AFSR verifies that mandatory training has been successfully completed.</p>

**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).

PII retention and destruction practices within ASFR PRIMS are consistent with the following National Archives and Records Administration (NARA) Records Control Schedule (RCS):

DAA-0468-2013-0009: Official Correspondence Files and Briefing Books of the OS Components. Routine Files. Disposition Instruction: Temporary. Cutoff at the close of the calendar year in which created or received. Destroy 5 year(s) after cutoff. Disposition Authority: DAA-0468-2013-0009-0002

**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.

Per NIST SP 800-53, Revision 5, PII collected and maintained within ASFR PRIMS is secured utilizing the following administrative, technical, and physical controls:

**Administrative Controls:** Only authorized personnel have access to PII within ASFR PRIMS. Access requires System Owner (SO) approval; system administrators monitor user activity. Additional administrative controls include but are not limited to HHS Cybersecurity Awareness Training, service level agreements (SLAs), contractor agreements, and system documentation; further administrative safeguards are documented in the System Security and Privacy Plan (SSP). Administrative measures utilized to protect and control access to PII are implemented in accordance with applicable laws, executive orders, directives, regulations, policies, standards, and guidelines, and enforced utilizing the policies and procedures provided by HHS.

**Technical Controls:** ASFR PRIMS utilizes multi-factor authentication (MFA) to control access and provides mechanisms to enable individuals to have access to elements of their PII as needed. The system is configured utilizing the concept of least privilege, allowing only the access necessary to accomplish assigned tasks in accordance with organizational mission and business functions. Additional technical controls include but are not limited to firewalls, encryption, and intrusion detection systems; further technical safeguards are documented in the SSP. Technical measures utilized to protect and control access to PII are implemented in accordance with applicable laws, executive orders, directives, regulations, policies, standards, and guidelines, and enforced utilizing the policies and procedures provided by HHS.

**Physical Controls:** ASFR PRIMS is located within Appian Corporation's Federal Risk and Authorization Management Program (FedRAMP) authorized cloud environment, Appian Cloud. Appian Cloud utilizes the physical and environmental protection provided by Amazon Web Services (AWS). Physical controls include but are not limited to security guards, fencing, security feeds, restricted access, back-up power equipment, heating, ventilation, and air conditioning (HVAC) systems, and fire suppression equipment. Additional physical safeguards are documented in the SSP. Physical security measures utilized to protect and control access to PII and protect facilities from intrusion and environmental hazards are implemented in accordance with applicable laws, executive orders, directives, regulations, policies, standards, and guidelines, and enforced utilizing the policies and procedures provided by HHS.

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	3/19/2025
<b>Privacy Analyst Comments:</b>	Vanessa, this PIA is ready for your review.  All necessary questions have been answered.  Thank you,  Jon	<b>Privacy Analyst Days Open:</b>	

### SOP Review

<b>SOP Review Status:</b>	Approved	<b>SOP Signature:</b>	
<b>SOP Comments:</b>		<b>SOP Review Date:</b>	4/4/2025
		<b>SOP Days Open:</b>	17

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	4/14/2025
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Shanai Shobowale  4/14/2025 Minor comment for PTA. This PIA is ready for SAOP review and approval.	<b>Agency Privacy Analyst Days Open:</b>	10

### SAOP Review

<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	Archer_Signature_Crystal_Bland.docx
<b>SAOP Comments:</b>		<b>SAOP Review Date:</b>	4/15/2025
		<b>SAOP Days Open:</b>	1

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments				
Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmos_Release	3/17/2025	Please also select 'user credentials' for this response.	
PIA - 6A	Data Feed Service, piafrmos_Release	3/17/2025	<p>As truncated SSNs are collected by and/or maintained in the system, as indicated in PIA-1 and PIA-6, this response should:</p> <ul style="list-style-type: none"> <li>• Cite the legal authorities which permit or require the use of SSNs; and</li> <li>• Explain how those authorities permit the use of SSNs if not evident from the cited authorities.</li> </ul> <p>The cited legal authorities should include at least one statute or Executive Order.</p> <p>Additional considerations: Tips for finding the legal authorities that require or permit collection of SSNs:</p> <ul style="list-style-type: none"> <li>• Almost every system that collects SSNs will require a SORN and that SORN will almost always list the legal authorities that require or permit collection of the SSN.</li> <li>• Legal authorities may be found in the system's budget documents, information collection forms, or the program office's website.</li> <li>• OpDiv SOP, OpDiv Office of General Council, or the Department Privacy Act Officer in OS/ASPA may be able to assist in identifying the legal authorities that require or permit collection of SSNs.</li> </ul>	
PIA - 10B	Data Feed Service, piafrmos_Release	3/17/2025	As this is still being determined, this response can be left blank or 'TBD'.	
PIA - 1	BLAND, CRYSTAL	4/14/2025	<p>On the next iteration of the PTA:</p> <p>PTA-5: Please include the following PII elements "Truncated SSN, Education Records, Vehicle Identifier, Employment Status, and Driver License."</p>	

### Admin Section

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

### Miscellaneous Fields

Last Updated:	4/15/2025 8:59 AM	History Log:	<a href="#">View History Log</a>
---------------	-------------------	--------------	----------------------------------