## Signed Date: 5/2/2022

## Approved

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**

		PIA ID:	1439889
PIA Name:	OS - OASH-Force -	Title:	OS - OASH-Force
OPDIV:	OS		
			РТА
PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system		Initiation
PTA - 1B:	Is this a FISMA-Reportable system?		No
PTA - 2:	Does the system include a website or online application?		Yes
PTA - 2A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?		
URL Detail	s		
Type of URL	List Of UR	L	
HHS Intran (HHS Interna	ll) (Staging)	): https:/	ttps://oashsps.lightning.force.com/ //oashspsoashspsstg.lightning.force.com/ https://oashspsoashspsdev.lightning.force.com/
PTA - 3:	Is the system o electronic collect agency or controperated?	ction,	Contractor
PTA - 3A:	Is the data cont the system own	tained in ned by	Agency

	the agency or contractor?	
PTA - 5:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Νο
PTA - 5A:	If yes, Date of Authorization	
PTA - 5B:	If no, Planned Date of ATO	6/1/2022
РТА - 8:	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?	Within Office of the Assistant Secretary for Health Force (OASH-Force) system, there are four individual applications that support unique business processes. Users are assigned a specific profile, role, and permission set(s) that provide them access to the functionality required to execute their responsibilities within the system. <b>Correspondence Management</b> (Office of the Assistant Secretary for Health Secretary's Policy

## System (OASH SPS))

Case Managers can create case records manually. Correspondence Management case record types include Correspondence, Memos, Reports to Congress, Regulations, Guidance, Press Releases, and Freedom of Information Act (FOIA) requests and Invitations. Case managers manage case records, whether they are created manually, via email-to-case, where an email is sent to a specified email address and automatically creates a case in the system or via form-to-case, where information is entered into a form and creates a case in the system on submission. Case Managers can submit cases to the Immediate Office of the Secretary (IOS). Case Managers create and track Assignments to offices. Types of assignments include authoring, clearance, and information only. Case Managers respond to assignments from IOS. An integration with the IOS correspondence management solution allows for this capability. Case Managers send emails from their case and/or assignment records.

Assignment Managers can respond to assignments sent to their office; create sub-assignments; send emails from their assignments.

**Compliance and Prisoner Research System (CAPS)** - Two groups within the Office for Human Research Protections (OHRP) use CAPS to manage five case types associated with research. The Division of Compliance (DCO) is responsible for Incident Reports, Complaints, Investigations, and Food and Drug Administration (FDA) Investigations. Prisoner Research Requests are also managed in CAPS. Cases are created manually, or via email-to-case or web form. The Prisoner Research Request web form and the Incident Report web form are active in production. The Complaint web form has been developed and demonstrated in lower environments but has not yet been approved for hosting on an external webpage. The Human Assurance Tracking System (HATS), an external database hosted by the National Institutes of Health (NIH) (but owned by OHRP) is integrated with CAPS to create/update Accounts and associated Contact records for Institutional Review Boards Organizations (IORGs), Federal Wide Assurance (FWAs), and Institutional Review Boards (IRB).

Recruitment, Onboarding, Micropurchases (EXO) (EXO is the acronym used for this application. It was derived from "Executive Office".) - This application is for management of recruitment activities, Onboarding of new hires, and processing micropurchase requests including hardware, software, office equipment/furniture, training/conferences, etc. Various public groups, queues, list views, email notifications, and approval processes assist users with managing these objects.

**National Youth Sports System (NYSS)** - The Office of Disease Prevention and Health Promotion (ODPHP) manages applications from public and private sector organizations that support the National Youth Sports Strategy (NYSS) to become a National Youth Sports Strategy Champions (NYSS Champion). NYSS Champions can be youth-serving organizations that work in alignment with the NYSS or organizations that support youth sports through donations or other means. Organizations submit a statement of interest acknowledging their support of the NYSS vision, and if selected as a NYSS Champion, receive recognition from ODPHP and the President's Council on Sports, Fitness, and Nutrition (PCSFN) on Health.gov, a digital NYSS Champion badge to highlight their support of the NYSS, and tools to disseminate the NYSS and promote physical activity. NYSS users actively manage requests from organizations applying to be part of the NYSS Champions program. This application uses the Case, Account, and Contact objects.

РТА - 9:	the types of information	The types of data stored in OASH-FORCE include: information pertaining to correspondence (incoming and outgoing), reports to Congress, memoranda, regulatory creation, rule publication, FOIA requests, documents for signature by the Assistant Secretary for Health (ASH) or Principal Deputy Assistant Secretary for Health (PDASH), policy related documents, invitations sent to the Surgeon General or ASH, National Youth Sports Strategy (NYSS) Champions organizational applications, Incident reports, Complaints, and Investigations pertaining to FWAs, IORGs, and IRBs; micro-purchase requests, and contact and account information such as names, phone numbers, emails, and/or mailing addresses, system user information such as name, username, email, Health and Human Services identification (HHSID) (for purposes of Single Sign-On (SSO). The length of time the information is stored in the system varies according to the type of information and associated record retention/document storage/maintenance requirements overseen by the office that owns those records. Information is stored on the system between 5 - 30yrs.
РТА -9А:	Are user credentials used to access the system?	Νο
PTA - 9B:	Please identify the type of user credentials used to access the system.	HHS User Credentials HHS Password
		HHS Username
		HHS/OpDiv PIV Card
PTA - 10:		The information collected (into) and maintained in the system is in support of the business processes of each office that uses the system. Names, email addresses, HHSID, and Usernames for licensed users of OASH-Force are maintained on the user record. Correspondence Management (OASH SPS) users manage and track documents (Correspondence, Memos, Reports to Congress, Regulations, FOIA, Press Releases) throughout their lifecycle. Case Managers are able to create cases (manually or via email to case), create and track assignments (authoring, clearance, info only) to offices, as well as submit cases to IOS, and respond to assignments from IOS (due to an integration with the IOS correspondence management solution). Contact information (name, email address and/or mailing address) for those who have submitted correspondence requiring a response is available on the case and/or assignment record. In addition to using the Case and Assignment objects to manage documents, users are able to send

and receive emails off cases and assignments which allows for tracking of all communication related to an item to be stored in one location. The Assistant Secretary of Health and Surgeon General Invitations are also managed via this application. These Invitation cases can be created manually, or via web form-to-case (the web forms are hosted on the HHS website) and contain a requestor's name, email address and/or phone number, and information about the event the invitation pertains to. Compliance and Prisoner Research System (CAPS) - Two groups within the Office for Human Research Protections (OHRP) use CAPS to manage 5 case types associated with research. The Division of Compliance (DCO) is responsible for Incident Reports, Complaints, Investigations, and FDA Investigations. Prisoner Research Requests are also managed in CAPS. Cases are created manually, or via email-to-case or web form. The Prisoner Research Request web form and the Incident Report web form are active in production. The Complaint web form has been developed and demonstrated in lower environments but has not vet been approved for hosting on an external webpage. The Human Assurance Tracking System (HATS), an external database hosted by NIH (but owned by OHRP) is integrated with CAPS via an OData connector that runs daily at 3am that creates/updates Accounts and associated Contact records for IORGs, FWAs, and IRBs. The information retained under HATS deals with description of the institution, contact information for leadership, and the specific type of protections used at the site. The Recruitment, Onboarding, Micropurchases (EXO) application is for management of recruitment activities (Postings), Onboarding of new hires, and processing micropurchase requests (hardware, software, office equipment/furniture, training/conferences, etc.). Staff names and email addresses for those submitting a micropurchase service request are collected. National Youth Sports System (NYSS) - Organizations applying to be part of the NYSS Champions program share their organization's name, website, description, and mailing address, a point of contact name and email address, and organizational goals/actions as well as populations served.

PTA - 10A: PTA - 10B:	Are records in the system retrieved by one or more PII data elements? Please specify which	No
PTA - 10B:	PII data elements are used.	
PTA - 11:	Does the system collect, maintain, use or share PII?	Yes
		PIA
PIA - 1:	Indicate the type of PII that the system will collect or maintain	Name
		E-Mail Address
		Phone numbers
		Mailing Address
		User Credentials
		Others - Tattoo information
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained, or shared	Business Partners/Contacts (Federal, state, local agencies)
		Employees/ HHS Direct Contractors
		Public Citizens
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system	Above 2000
PIA - 4:	For what primary purpose is the PII used?	Contact information (names, email addresses, phone numbers, and mailing addresses) are required to reply to correspondence, complaints, and incident reports. Usernames are required for system access for system users. Tattoo information is required because Commissioned Corps members must apply for tattoo waivers.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g., testing, training or research)	Not Applicable. There is secondary use for Personally Identifiable Information (PII)
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	5 USC 301, Departmental regulations
PIA - 8:	Provide the number, title, and URL of the	09-90-1901 - HHS Correspondence, Comment, Customer Service, and Contact List Records, https://www.federalregister.gov/documents/2021/03/04/2021-04463/privacy-act-of-1974-system-of -records 09-90-0058 - Tracking Records and Case Files for FOIA and Privacy Act Requests and Appeals, https://www.federalregister.gov/documents/2016/03/29/2016-07060/privacy-act-of-1974-system-of -records-notice 09-40-0002 Public Health Service (PHS) Commissioned Corps Medical Records,
	development.	https://www.hhs.gov/foia/privacy/sorns/09400002/index.html

		09-37-0021 HHS Records Related to Research Misconduct Proceedings, [Exempt based on (k)(2)/(k)(5); see 59 FR 36717 (Final Rule) - https://www.hhs.gov/foia/privacy/sorns/exempt-systems/59fr36717.html]
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains
		Hard Copy Mail/Fax
		Email
		Online
		Government Sources
		Within the OPDIV
		Non-Government Sources
		Members of the Public
		Private Sector
PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	0990-0481, exp 02/28/2025 0937-0198, exp 08/31/2023
PIA - 9B:	Identify the OMB information collection expiration date.	2/28/2025
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	Yes
PIA - 10A:	Identify with whom the PII is shared or disclosed and for what purpose	Within HHS
PIA - 10A (Justificatio n):	Explain why (and the purpose) PII is shared with each entity or individual.	When a record requires Health and Human Services (HHS) Secretary signature and approval, record information from Office of Assistance Secretary for Health Force (OASH-Force) may be shared with the Immediate Office of the Secretary (IOS) correspondence management system. In order to provide signature and approval, the Secretary needs to review complete record information.
PIA - 10B:	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement, Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	Memorandum of Understanding (MOU) between the Immediate Office of the Secretary's Correspondence Management System (IOS SPS) and OASH-Force has been developed.
PIA - 10C:	Describe process and procedures for logging/tracking/accoun	There is no business need to disclose any system records containing PII outside of HHS.

	ting for the sharing and/or disclosing of PII	
PIA - 11:	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason	Individuals who write to OASH or request a tattoo waiver may provide their PII (name, email and/or mailing address and/or phone number) – no PII is sent in response to their inquiry as these records are not created as a result of direct collection of information from an individual. When an individual submits an incident report or complaint or sends an application to be part of the NYSS Champions program, an automatic response is sent from the system confirming their submission.
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 13:	Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason	PII is only collected when individuals supply their information via correspondence/inquiry/waiver request. Since the system does not request PII from individuals, there is no opt out process.
PIA - 14:	notify and obtain consent from the individuals whose PII is in the system when	N/A – The PII available in the system relates to information provided in correspondence, incident reports, complaints, or waiver requests. This PII is used only to allow for a response to be sent to the original sender or to obtain permissions for a waiver. PII will not be used for any other purpose. If notice needed to be given, the system has the ability to report on contact information and therefore could contact those who have sent correspondence to OASH, submitted complaints or incident reports, and/or requested waivers.
PIA - 15:	place to resolve an individual's concerns	If an individual has concerns regarding any record information in the OASH-Force system, they may contact the OASH office with whom they have shared information, who may then follow-up with OASH Force system administrators, if the concern relates to information in OASH-Force. System users are able to update contact information without assistance from system administrators. System Administrators can assist system users in locating information within the system.
PIA - 16:	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's	Contact record information is reviewed and updated when new correspondence/inquiry is received from an existing contact.

	integrity, availability, accuracy, and relevancy. Please address each element in your response. If no processes are in place, explain why not			
PIA - 17:	Identify who will have	Users		
PIA - 17:	access to the PII in the system and the reason why they require access			
		Developers		
		Contractors		
	Provide the reason of a	ccess for each of the groups identified in PIA -17		
	System users create an	nd/or maintain correspondence, incident report, and waiver records.		
	Executive Secretary users responsible for replying to direct reply correspondence need access to contact information in order send replies.			
	Developers and Admins	s maintain and enhance the system.		
PIA - 17A:	Soloot the time of			
PIA - 17B:	Select the type of contractor	HHS/OpDiv Direct Contractor		
PIA - 18:	Describe the administrative procedures in place to determine which system users (administrators, developers,	All potential system users must be approved by the business owner before being activated as users with access to the system. Access to records and PII contained on those records is granted based on the principle of least privilege. Users' system access is limited to the functions and information which is essential to their job functions.		
	contractors, etc.) may access PII			
PIA - 19:	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			
PIA - 20:	Identify training and awareness provided to personnel (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	Users must complete HHS-required security training annually (e.g., Annual HHS Cybersecurity Awareness Training).		
PIA - 21:	Describe training	Refresher trainings are provided to internal users on request. Training sessions are offered to all		

	system users receive (above and beyond general security and privacy awareness training).	new users.
PIA - 23:	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific NARA records retention schedule(s) and include the retention period(s)	Information is maintained in the system as long as it is needed and follows the General Records Schedule (GRS) in use, that applies to the PII maintained in this system. General Records Schedule (GRS) 3.1. Item 012, Disposition Authority: DAA-GRS-2013-0005-0008.
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	Username and password required to access the system; Principle of least privilege / access to minimum information required to do job enforced via profiles, roles, permissions set and sharing rules; moving toward Multifactor Authentication (MFA)/Single Sign-on (SSO) that will require Personal Identity Verification (PIV) card to access.
PIA - 25:	Describe the purpose of the web site, 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	Uniform Resource Locator (URL) is in a public domain, but only activated users with username and password are able to login to/access the system (https://oashsps.lightning.force.com/)
PIA - 26:	Does the website have a posted privacy notice?	Νο
PIA - 27:	Does the website use web measurement and customization technology?	Νο
PIA - 27A:	Select the type of website measurement and customization technologies is in use and if it is used to collect PII	
PIA - 28:	Does the website have any information or pages directed at children under the age of thirteen?	Νο

PIA - 28B:	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?	
PIA - 29:	Does the website contain links to non-federal government websites external to HHS?	No