

## 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 - OASH Smartsheet - QTR1 - 2025 - OS2333592	<b>PIA ID:</b>	2745053
<b>Name of Component:</b>	OS - OS - OASH Smartsheet	<b>Name of ATO Boundary:</b>	OASH Smartsheet
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	15
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	2/3/2025
<b>Next Assessment Date:</b>	N/A	<b>Expiration Date:</b>	2/18/2028
<b>Office:</b>		<b>OPDIV:</b>	OS
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	OS2333592
<b>Legacy PIA ID:</b>		<b>Make PIA available to Public?:</b>	Yes
<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.		4/28/2026
<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?	Contractor

<p><b>PTA - 4:</b></p>	<p>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>	<p>The HHS Office of the Assistant Secretary for Health (OASH) Smartsheet is an HHS Major Application (MAJ) Contractor Owned Contractor Operated (CoCo) system hosted in the Smartsheet Government Cloud (Smartsheet Gov) environment. Smartsheet provides the HHS OASH organization a cloud collaboration platform to enable users to plan, capture, manage, automate, and report on work while utilizing various collaboration features. The OASH Smartsheet application provides a simple, intuitive interface that empowers users to quickly configure, adapt, and improve their work processes to speed execution. Various features within the application include project tracking, smart grids, calendars, dashboards, cards, portals, forms, automations, and control center. Smartsheet projects provide tools for effective project management. HHS OASH uses this application for project tracking, smart grids, calendars, dashboards, cards, portals, forms, automations, and control center. OASH Smartsheet will utilize the Smartsheet Gov platform to facilitate individuals that are onboarding as OASH OCIO contractors only. Privileged users assigned by the HHS OASH Systems Owner are allowed to access the OASH Smartsheet application and can modify and edit data within a sheet, view dashboards, collaborate with other users of the platform, and receive alerts and notifications via email or from the Smartsheet Platform.</p>
<p><b>PTA - 5:</b></p>	<p>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.</p>	<p>Smartsheet processes, collects, and stores the names and contact information for individuals that are onboarding as OASH OCIO contractors only. Contact information is defined to include: Contactor first name, last name, address, (city, state, zip code, country) phone number, name of COR / Team Sponsor, Vendor/Company Name This information will be stored indefinitely. The following types of data are processed within the OASH Smartsheet. Budget Formulation, Capital Planning, Enterprise Architecture, Strategic Planning, Budget Execution, Workforce Planning, Management Improvement, Budgeting &amp; Performance Integration, Tax and Fiscal Policy, Customer Services, Official Information Dissemination, Product Outreach, Public Relations, Personal Identity and Authentication, General Information, Help Desk Services, Travel, Funds Control, Accounting, Collections and Receivables, Cost Accounting / Performance Measurement, HR Strategy, Staff Acquisition, Organization and Position Management, Compensation Management, Employee Performance Management, Separation Management, Human Resources Development, Inventory Control, Information System Security, Information Management, Health Care Research and Practitioner Education, Federal Grants (Non-State), Project / Competitive Grants</p>
<p><b>PTA - 5A:</b></p>	<p>Are user credentials used to access the system?</p>	<p>No</p>
<p><b>PTA - 5B:</b></p>	<p>Please identify the type of user credentials used to access the system.</p>	

<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.	Information is maintained to ensure new hired successful onboarding process. Individual information is collected for contract tracking, when the OASH Smartsheet Sys Admin receives a request from the System Owner to add a new user. The information collected about each individual is listed below Contactor first name, last name, address, (city, state, zip code, country) phone number, name of COR / Team Sponsor, Vendor/Company Name
<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?	No
<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)?	No
<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.	<a href="https://app.smartsheetgov.com/b/home?ss_v=179.0.0">https://app.smartsheetgov.com/b/home?ss_v=179.0.0</a>  Users must be invited to collaborate and /or request access via email to the administrator.
<b>PTA - 10:</b>	Does the website have a posted privacy notice?	No
<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?	No
<b>PTA - 12A:</b>	Select the type(s) of website measurement and customization technologies in use and if it is used to 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?	Yes
<b>PTA - 21:</b>	Does this system use artificial intelligence (AI) tools or technologies?	No

PIA		
PIA		
<b>PIA - 1:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address Phone numbers Mailing Address Other - Free text Field - name of Contracting Officer's Representative (COR)/ Team Sponsor, Vendor/Company name
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Business Partners/Contacts (Federal, state, local agencies) Employees/ HHS Direct Contractors
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	51 - 200
<b>PIA - 4:</b>	For what primary purpose is the PII used?	OASH Smartsheet will utilize the Smartsheet Gov platform to facilitate individuals that are onboarding as Office of the Assistant Secretary for Health (OASH) Office of the Chief Information Officer (OCIO) contractors only.
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	There are no secondary uses for which the PII is used
<b>PIA - 6:</b>	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	
<b>PIA - 7:</b>	Identify legal authorities governing information use and disclosure specific to the system and program.	5 USC 301, Departmental Regulation
<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.	Contractor first name, last name, address (city, state, zip code, country) Phone number, name of COR/ Team Sponsor, Vendor/Company 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.	OASH-Smartsheet falls under the following SORN: 09-90-0777 Facility and Resource Access Control Records, 75 FR 47812 (8/9/10), updated at 83 FR 6591 (2/14/18).
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains  Online

<b>PIA - 10:</b>	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes
<b>PIA - 10A:</b>	Provide the information collection approval number.	09-90-0777 Facility and Resource Access Control Records, 75 FR 47812 (8/9/10), updated at 83 FR 6591 (2/14/18).
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	2/4/2027
<b>PIA - 10C:</b>	Explain why an OMB information collection approval number is not required.	
<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.	If the users object to the collection, an account will not be created and their PII will not be uploaded into the system. It is an opt-in process.
<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.	A disclosure will be added to the form where PII is collected before the system's goes live. No major changes to the system are expected that would affect the rights and interests of the data subjects.
<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.	A "Smartsheet Privacy Notice"  Hyperlink ( <a href="https://www.smartsheet.com/legal/privacy">https://www.smartsheet.com/legal/privacy</a> ) at the bottom of the page provides a link on information to address an individual's concerns and a "Contact Us" link.

<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.	Through the required implementation of privacy controls as part of the OASH-Smartsheet Initial System Security Assessment & Authorization (A&A) process for the system's initial Authority to Operate (ATO) and the HHS Annual Security Control Assessment process of privacy controls, the OASH-Smartsheet Business Owner & System Owner ensures periodic review of the integrity, availability, and accuracy and relevance of the below data elements collected from individuals contained in the system.  First name, Last name, address (city, state, zip code, country) Phone number, personal email address, name of COR/ Team Sponsor, Vendor/Company name on HHS OASH Contractors, HHS email on HHS Employees
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Administrators
<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?	
<b>PIA - 18:</b>	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Administrators with a granted permissions with a need to know will have access to review and approve user accounts.
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Administrators with a granted permissions with a need to know will have access to review and approve user accounts.
<b>PIA - 20:</b>	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.	Role based access control (RBAC)
<b>PIA - 21:</b>	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.	OASH Smartsheet complies with the security training requirements set by the HHS Office of Information Security. System users are required to take annual on-line training for Privacy Awareness, general Information Systems Security Awareness.
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	In addition, ITIO provides the following Role Based Information Training for Executives, IT Administrators and Managers: Information Security for Executives Information Security for IT Administrators Information Security for Managers
<b>PIA - 23:</b>	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).	General Records Schedule (GRS) 3.2. Item 010, Disposition Authority: DAA-GRS-2013-0006-0001.Destroy 1 year(s) after system is superseded by anew iteration or when no longer needed for agency/IT administrative purposes to ensure a continuity of security controls throughout the life of the system.

**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.

The server host location employs multiple levels of perimeter protection to prevent unauthorized access and information disclosure. All PII collected resides on servers in a secured facility. The system undergoes an annual Certification and Accreditation review, as well as Security Testing & Evaluation of all sites and servers every 3 years. All remote server access is restricted to an "as needed" basis and is password protected. Access to the building that houses the Data Center is restricted to authorized employees, and access to the Datacenter itself is restricted further. Only government credentialed personnel with specific access to the Data Center may enter the facility, all access is logged and monitored. Access to the servers that store PII are restricted to HHS authorized Virtual Private Network (VPN) users, who have been granted access to the Smart Sheet environment. All servers and Web sites are monitored for unauthorized access attempts, there are procedures in place to address any such findings. Additionally, only Smartsheet administrators are allowed to connect and interact with the servers. Administrator accounts are strictly monitored and reside on an Active Directory controller specific to the Smartsheet environment. All personnel who have access are required to pass HHS privacy training.

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	2/6/2025
<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>	2/6/2025
		<b>SOP Days Open:</b>	3

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	2/11/2025
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Shanai Shobowale 2/11/2025 This PIA is ready for SAOP review and approval.		<b>Agency Privacy Analyst Days Open:</b>
			5

### SAOP Review

<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	Archer Signature_Bridget Guenther.docx
<b>SAOP Comments:</b>		<b>SAOP Review Date:</b>	2/18/2025
		<b>SAOP Days Open:</b>	7

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

### Comments

Question Name	Submitter	Date	Comment	Attachment
No Records Found				

### 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:	2/18/2025 2:27 PM	History Log:	<a href="#">View History Log</a>
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