

Copy PIA (Privacy Impact Assessment)

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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

PIA Name:	OS - DRT - QTR1 - 2025 - OS2439769	PIA ID:	2964865
Name of Component:	OS - OA Document Routing Tool	Name of ATO Boundary:	OA Document Routing Tool
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	33
Submission Status:	Submitted	Submit Date:	4/1/2025
Next Assessment Date:	N/A	Expiration Date:	4/14/2028
Office:		OPDIV:	OS
Security Categorization:		OpDiv PIA ID:	OS2439769
Legacy PIA ID:		Make PIA available to Public?:	No
1:	Identify the Enterprise Performance Lifecycle Phase of the system.		Initiation
2:	Is this a FISMA-Reportable system?		No
3:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		No
4:	ATO Date or Planned ATO Date.		5/1/2025
5:	Is the system or electronic information collection, agency or contractor operated?		Contractor

PTA

PTA		
PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	New
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	
PTA - 3:	Is the data contained in the system owned by the agency or contractor?	Agency
PTA - 4:	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.	The purpose of the Assistant Secretary for Financial Resources (ASFR) Office Acquisitions (OA) Document Routing Tool (DRT) is to support the mission of the ASFR OA by providing a secure, scalable, and manageable document workflow and routing service to allow staff to communicate, respond to, and research historical document routing and signature tasks with maximum efficiency and accuracy. DRT is a DocuSign-based Software-as-a-Service (SaaS) solution for the execution of legal agreements and routing flows. It allows ASFR users to receive and route documents from HHS Operational Divisions (OPDIVs) and other internal HHS documents for Senior Procurement Executive (SPE) review, approval, and signature.

<p>PTA - 5:</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>OA's diverse lanes of effort produce multitudes of complex tasks and directives that originate and flow through the Agency daily. The ability to assign, track, and manage a multitude of tasks, which have the potential to become new initiatives or congressional directives, increases operational requirements that propel the Agency staff to increase workflow to meet mission requirements.</p> <p>The type of information collected will consist of customer data and contract/procurement project details.</p> <p>Customer Data: User login credentials and Business customer details such as First/Last name, business name, telephone number, business phone number and email.</p> <p>Contract/Procurement Project Details: This will include, but are not limited to: acquisition plans, acquisition strategies, determinations and findings, small business forms, independent government estimates, information technology acquisition review (ITAR) documents, justification and approvals, market research, performance work statements, statements of objectives, statements of work, secretary decision memos, legal review notes, OPDIV review notes, purchase requisitions, congressional notifications, blanket purchase agreements, broad agency announcements, contracts, modifications, other transaction authority documents, and task/delivery orders. The files types include all microsoft office products; e.g. Word, Excel, PowerPoint, etc., and Portable Document Format (PDF) files. The file sizes vary. The information is stored indefinitely until manually purged. Agency and/or company information included in contract language could be considered proprietary to HHS and/or Company.</p>
<p>PTA - 5A:</p>	<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. The system providing credentials is</p>
<p>PTA - 5B:</p>	<p>Please identify the type of user credentials used to access the system.</p>	

PTA - 6:	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.	The DRT will use the contract lifecycle management (CLM) portion of DocuSign with the primary intent of to communicate, respond to, and research historical document routing and signature tasks with maximum efficiency and accuracy; more specifically, to receive and route documents from HHS Operational Divisions (OPDIVs) and other internal HHS documents for Senior Procurement Executive (SPE) review, approval, and signature. Users: Collected information will consist of first/last name, agency, email, username and password. Customer information (package details): OPDIV, Phone, Package Overview, Package Type, Submitted Date, Target Completion Date, Project Details, Project Title, Project Description, Contract Type, Period of Performance Start Date, Period of Performance End Date, Estimated Amount, Review Details, Expedited Review, Date Needed By, Total Number of Documents, Document Types, and Notes.
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	No
PTA - 8:	Does the system include a website or online application?	Yes
PTA - 8A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	No
PTA - 9:	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 application will be the DRT application itself. Users will access the application through the internal URL (https://account.docuSign.com/) using Single Sign-On (SSO), via user Common Access Card (CAC). The application will be accessible only to ASFR users and HHS Operational Division (OPDIVs) with active accounts controlled by ASFR.
PTA - 10:	Does the website have a posted privacy notice?	No
PTA - 11:	Does the website contain links to non-federal government websites external to HHS?	No
PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
PTA - 12:	Does the website use web measurement and customization technology?	No
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	
PTA - 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA - 13A:	Does the website collect PII from children under the age thirteen?	
PTA - 13B:	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?	
PTA - 14:	Does the system have a mobile application?	No
PTA - 14A:	Is the mobile application HHS developed and managed or a third-party application?	
PTA - 15:	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	

PTA - 16:	Does the mobile application/ have a privacy notice?	
PTA - 17:	Does the mobile application contain links to non-federal government websites external to HHS?	
PTA - 17A:	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
PTA - 18:	Does the mobile application use measurement and customization technology?	
PTA - 18A:	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
PTA - 19:	Does the mobile application have any information or pages directed at children under the age of thirteen?	
PTA - 19A:	Does the mobile application collect PII from children under the age thirteen?	
PTA - 19B:	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?	
PTA - 20:	Is there a third-party website or application (TPWA) associated with the system?	No
PTA - 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

PIA		
PIA		
PIA - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address Phone numbers Mailing Address Legal Documents User Credentials Other - Free text Field - Business Name and Agency Others - Chart No., TIN, DUNS, Provider License #
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 Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	51 - 200

PIA - 4:	For what primary purpose is the PII used?	<p>The Document Routing Tool (DRT) will use the contract lifecycle management (CLM) portion of Docusign with the primary intent of to communicate, respond to, and research historical document routing and signature tasks with maximum efficiency and accuracy; more specifically, to receive and route documents from HHS Operational Divisions (OPDIVs) and other internal HHS documents for Senior Procurement Executive (SPE) review, approval, and signature.</p> <p>Customer PII will primarily be package detail information such as: OPDIV, Phone, Package Overview, Package Type, Submitted Date, Target Completion Date, Project Details, Project Title, Project Description, Contract Type, Period of Performance Start Date, Period of Performance End Date, Estimated Amount, Review Details, Expedited Review, Date Needed By, Total Number of Documents, Document Types, and Notes. Users: Collected information will consist of first/last name, agency, email, username and password.</p>
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	Not Applicable (N/A). There are no secondary users of PII in DRT.
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	5 USC 301
PIA - 8:	Are records in the system retrieved by one or more PII data elements?	No
PIA - 8A:	Please specify which PII data elements are used to retrieve records.	
PIA - 8B:	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.	
PIA - 9:	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"> Phone Email <p>Government Sources</p> <ul style="list-style-type: none"> Within the OPDIV Other HHS OPDIV <p>Non-Government Sources</p> <ul style="list-style-type: none"> Private Sector
PIA - 10:	Is there an Office of Management and Budget (OMB) information collection approval number?	No
PIA - 10A:	Provide the information collection approval number.	
PIA - 10B:	Identify the OMB information collection approval number expiration date.	

PIA - 10C:	Explain why an OMB information collection approval number is not required.	The system only facilitates tracking/signing of internal Assistant Secretary for Financial Resources (ASFR) acquisition packages.
PIA - 11:	Is the PII shared with other organizations outside the system's Operating Division?	Yes
PIA - 11A:	Identify with whom the PII is shared or disclosed.	Within HHS
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	User specific PII is shared directly with the individual user or agency procurement analyst.
PIA - 11C:	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)).	Not Applicable.
PIA - 11D:	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.	The Document Routing Tool (DocuSign) maintains tracking logs for all user activity.
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 12A:	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
PIA - 13:	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.	PII collection is conveyed as part of the contract negotiation and package development process. Collected PII consists of package/high-level customer data. There is not an option to opt out of information collection as it would hinder the contract process.
PIA - 14:	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.	Direct email
PIA - 15:	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.	Direct email to the individual users to resolve their concerns.
PIA - 16:	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.	DRT Administrators will rely on emails from customers and internal dashboards to ensure PII within the system is periodically reviewed. Integrity: Daily while in process. As needed prior to award. Availability: Daily while in process. As needed prior to award. Accuracy: Daily while in process. As needed prior to award. Relevancy: As needed
PIA - 17:	Identify who will have access to the PII in the system.	Users Administrators Developers Contractors

PIA - 17A:	Select the type of contractor.	HHS/OpDiv Direct Contractors Third-Party Contractor (Contractors other than HHS Direct Contractors)
PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Users: Users will have access to the packages they have been assigned direct access to. Administrator: Administrators will have access to the packages to ensure information is accurate or resolve issues. Developers: to ensure information is accurate or resolve issues. Contractors: to ensure information is accurate or resolve issues.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Users will have access to the packages they have been assigned direct access to. Administrative controls regarding PII access are made by HHS. Determinations are made based on role-based access controls and a need-to-know basis, allowing users access to the minimum amount of data to perform their job.
PIA - 20:	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.	Administrative Controls: Only authorized DRT personnel have limited access to PII. Access to DRT requires Opdiv Administrator approval. Additional administrative safeguards are documented within the System Security Plan (SSP). Training requirements, sanction guidelines, and risk analyses are enforced utilizing the policies and procedures provided by HHS. Technical Controls: DRT utilizes single sign on (SSO) and Common Access Card (CAC) to control access. DRT is configured utilizing the concept of least privilege, allowing only the accesses which are necessary to accomplish assigned tasks in accordance with organizational missions and business functions. Additional technical safeguards are documented within the SSP. The technological measures used to protect and control access to PII are enforced utilizing the policies and procedures provided by HHS.
PIA - 21:	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.	All users sign the HHS Rules of Behavior prior to gaining access to DRT and complete any requisite training at the direction of HHS. All users take and complete the annual security awareness training.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	DocuSign user training

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).

Data is stored in accordance with the contract terms in HHS Data Use Agreements. DRT will follow the General Records Schedule (GRS) 1.1 Financial Management and Reporting Records.

Temporary. Destroy when business use ceases.

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.

Administrative Controls: Only authorized DRT personnel have limited access to PII. Access to DRT requires Opdiv Administrator approval. Additional administrative safeguards are documented within the System Security Plan (SSP). Training requirements, sanction guidelines, and risk analyses are enforced utilizing the policies and procedures provided by HHS.

Technical Controls: DRT utilizes single sign on (SSO) and Controlled Access Card (CAC) to control access. DRT is configured utilizing the concept of least privilege, allowing only the accesses which are necessary to accomplish assigned tasks in accordance with organizational missions and business functions. Additional technical safeguards are documented within the SSP. The technological measures used to protect and control access to PII are enforced utilizing the policies and procedures provided by HHS.

Physical Controls: The DRT system is located within the DocuSign FedRAMP Cloud security boundary. Physical safeguards are documented within the SSP. The physical measures designed to protect information systems, buildings, and equipment from unauthorized intrusions and hazards (environmental and natural), are enforced utilizing the policies and procedures provided by HHS.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	4/2/2025
Privacy Analyst Comments:	<p>Vanessa, this PIA is ready for your review.</p> <p>All necessary questions have been answered.</p> <p>Thank you,</p> <p>Jon</p>	Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:		SOP Review Date:	4/3/2025
		SOP Days Open:	2

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	4/14/2025
Agency Privacy Analyst Review Comments:	<p>Reviewer: Nestor Villafuerte</p> <p>4/14/2025 Other than a minor comment this PIA is ready for SAOP review and approval.</p> <p>On the next iteration of the PTA update the following: If Chart No., TIN, DUNS, Provider License # are collected, please include them in the next iteration of the PTA.</p>	Agency Privacy Analyst Days Open:	11

SAOP Review

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

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
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PIA - 1	Data Feed Service, piafrmos_Release	3/31/2025	Please leave an attached comment for a response to question 4 in the general information section: 4: ATO Date or Planned ATO Date.
PIA - 1	Data Feed Service, piafrmos_Release	3/31/2025	Please also select 'Other - Free text field' and include 'business name' and 'agency' in the response, as those are listed in the PTA as being collected as well.
PIA - 8A	Data Feed Service, piafrmos_Release	3/31/2025	If the response to PIA-8 is 'no' then this response should not contain any information. If specific PII data elements are used to retrieve records, please switch the response to PIA-8 from 'no' to 'yes'.
PIA - 8B	Data Feed Service, piafrmos_Release	3/31/2025	If the response to 8 is 'no' then this response should not contain any information. If the response to 8 is switched to 'yes', please consult with Beth Kramer to determine if/which SORN would be applicable to your system.
PIA - 10A	Data Feed Service, piafrmos_Release	3/31/2025	This response should be blank, as you have responded 'no' to question PIA-10, and indicated in PIA-10c that an OMB information collection approval number is not required.
PIA - 10B	Data Feed Service, piafrmos_Release	3/31/2025	This response should be blank, as you have responded 'no' to question PIA-10, and indicated in PIA-10c that an OMB information collection approval number is not required.
PIA - 15	Data Feed Service, piafrmos_Release	3/31/2025	Please identify to whom the direct email would be directed to. Please also indicate if users can reach out to a service desk or CSIRC in the event of any PII incidents.
PIA - 16	Data Feed Service, piafrmos_Release	3/31/2025	Please describe the processes and/or tools in place, to ensure that PII in the system is periodically reviewed for each of the listed elements in the response.
PIA - 23	Data Feed Service, piafrmos_Release	3/31/2025	23 - Please cite specific records retention schedules. Please list any of NARA's Records Control Schedule (RCS) Job Numbers or General Records Schedules (GRSs) that apply to the information maintained in the system; and/or State if NARA is determining the appropriate RCS Job Number or GRS for some or all of the information maintained in the

system and that the PII should be maintained until a determination is provided.

If you need assistance in determining this please reach out to:
 Karen Ballesteros
 and
 HHSRecordsManagement@hhs.gov

An example of this would be the following response:

“General Records Schedule (GRS) 3.2. Item 010, Disposition Authority: DAA-GRS-2013-0006-0001. Destroy 1 year(s) after system is superseded by a new 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 - 4	Data Feed Service, piafrmos_Release	3/31/2025	Please define the acronym 'DRT' on first use within the response.
PIA - 10C	Data Feed Service, piafrmos_Release	3/31/2025	Please define the acronym 'ASFR' on first use within this response.
PIA - 23	Data Feed Service, piafrmos_Release	4/2/2025	DAA-GRS2013-00030002
PIA - 1	VILLAFUERTE, NESTOR	4/9/2025	If Chart No., TIN, DUNS, Provider License # are collected, please include them in the next iteration of the PTA.

Admin Section

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

Miscellaneous Fields

Last Updated:	4/15/2025 9:00 AM	History Log:	View History Log
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