

## 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 - OWH Website - QTR4 - 2024 - OS2267532	<b>PIA ID:</b>	2615881
<b>Name of Component:</b>	OS - OS - Office on Women's Health Websites	<b>Name of ATO Boundary:</b>	Office on Women's Health Websites
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	50
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	12/27/2024
<b>Next Assessment Date:</b>	N/A	<b>Expiration Date:</b>	1/15/2028
<b>Office:</b>		<b>OPDIV:</b>	OS
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	OS2267532
<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)?		Yes
<b>4:</b>	ATO Date or Planned ATO Date.		
<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.	Internal Flow or Collection
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	OWH is currently using a third-party website: GovDelivery that was not previously identified as well as Pinterest, YouTube, Twitter, and Facebook.
<b>PTA - 3:</b>	Is the data contained in the system owned by the agency or contractor?	Contractor
<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.	OWH is used to provide national leadership and coordination to improve the health of women and girls through policy, education, and innovative programs.
<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.	Email addresses;  System logs are retained for a minimum of 365 days or as required for any investigation or other operational requirement that may occur.
<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.	Non-HHS User Credentials  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.	Access to GovDelivery (for customers and internal support personnel) is through the administration console. Email address information and access date/time are collected, for reasons of documenting system access and date/time for that access. Sending of bulletins is also logged for the purposes of being able to audit activities in the system at a later date.
<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)?	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 OWH public websites is managed using Drupal. All health content and resources are maintained, updated, and archived in accordance with OWH's annual editorial calendar. The health content maintained throughout the OWH websites is expert reviewed and cleared through the HHS Assistant Secretary for Public Affairs (ASPA) before being posted on the public sites. All other content pertains to OWH initiatives and health observances and is reviewed by OWH senior leadership before being promoted to production.
<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?	Yes
<b>PTA - 11A:</b>	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	Yes
<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

<b>PIA</b>		
<b>PIA</b>		
<b>PIA - 1:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Email Address User Credentials Other - Free text Field - IP address
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Employees/ HHS Direct Contractors Members of the public
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	The application uses multifactor authentication to verify only privileged user identity. This includes the user's email address, password, and an approved Internet Protocol (IP) address.
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	There is no secondary use for the Personally Identifiable Information (PII).
<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.	Email addresses and user credentials
<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.	N/A
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains Email Government Sources Within the OPDIV
<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.	N/A- This is not applicable because Office on Women's Health (OWH) is not using any information collection instruments, such as surveys or questionnaires, that would require Office of Management and Budget (OMB) approval.
<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.	<p>The online form tells users that they are submitting their email address to receive more information about a specific health topic from Office on Women's Health. The user has the option to call OWH as well if they prefer not to provide their PII.</p> <p>The user has the option to call OWH directly and not provide any PII</p>
<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.	If a major change were to occur, the Office on Women's Health would notify users via their e-mail and obtain their consent before using their email addresses in some other way.
<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.	All messages to individuals include several ways for people to get in touch with the OWH. People may email or call OWH's help desk (toll-free number), or unsubscribe. The unsubscribe function is automated, through OWH's email address and help desk are monitored by full-time, dedicated staff.
<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.	Web Content Management System (application): The application inherits HHS rules for password complexity, longevity, and login attempts, thus ensuring credential integrity. All accounts are granted and removed under the sole authority of the system owner, ensuring that all active accounts are both accurate and relevant.

<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Administrators Contractors
<b>PIA - 17A:</b>	Select the type of contractor.	HHS/OpDiv Direct Contractors Third-Party Contractor (Contractors other than HHS Direct Contractors)
<b>PIA - 17B:</b>	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
<b>PIA - 18:</b>	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	To create, review, and distribute OWH news announcements and manage website content.
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Access to The Office on Women's Health (OWH) account is limited to federal employees who are responsible for the creation, review and distribution of OWH news announcements, and for the management of website content.
<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.	Web Content Management System (application): The application supports multiple user role and granular permissions, based on role. The system owner controls how and to whom roles are assigned. Thus, people who only need to edit and create content cannot make other changes within the application; nor can they view information about other users. Only the application owner and system administrator can access all of the data in the application.
<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.	All personnel who access Office on Women's Health IT systems complete annual HHS security awareness and privacy awareness training courses.
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	Administration tutorials and in-person, one-on-one training with an experienced administrator are provided.
<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).	User Credentials retention schedule: 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 - 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:** Site administrators receive regular training in security rules and procedures for protecting PII. This training must be completed on an annual basis.

**Technical controls:** Usernames and passwords utilizes hashing for encryption. User accounts are automatically locked after 60 days of inactivity. User accounts are logged off of the site after 15 minutes of inactivity.

**Physical controls:** Our hosting solution provides physical security including video surveillance, biometric security, and round-the-clock onsite guards.

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	1/3/2025
<b>Privacy Analyst Comments:</b>	Hi Vanessa,  This PIA is ready for your review. All necessary questions have been answered.  Thank you,  Muriel.		<b>Privacy Analyst Days Open:</b>

### SOP Review

<b>SOP Review Status:</b>	Approved	<b>SOP Signature:</b>	
<b>SOP Comments:</b>	Note to SSPO: All third party apps are required to have a TPWA PIA.	<b>SOP Review Date:</b>	1/6/2025
		<b>SOP Days Open:</b>	10

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	1/8/2025
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Shanai Shobowale  1/8/2025 This PIA is ready for SAOP review and approval.	<b>Agency Privacy Analyst Days Open:</b>	2

### 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>	1/15/2025
		<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:	1/15/2025 12:48 PM	History Log:	<a href="#">View History Log</a>
---------------	--------------------	--------------	----------------------------------