


General Information		
PTA / PIA Name:	OS - PSC-WS: CAM - QTR4 - 2025 - OS3182221	PTA / PIA ID: 4055837
Component Name:	OS - OS - OS - PSC-WS: Customer Agreement Module	ATO Boundary Name: PSC WorkSmarter
Overall Status:	Complete 	# of Days - Open: 25
Submitter:		Submit Date: 11/18/2025
Next Assessment Date:	12/08/2028	Expiration Date: 12/8/2028
Office:		OpDiv: OS
Security Categorization:	Not Rated	
Make PIA available to Public?:	No	PIA Required: Yes
General 01:	Identify the Enterprise Performance Lifecycle Phase of the system.	Operations and Maintenance
General 02:	Is this a FISMA-Reportable system?	No
General 03:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
General 04:	ATO Date or Planned ATO Date.	10/11/2024
General 05:	Is the system or electronic information collection, agency or contractor operated?	
History Log:	View History Log	

Privacy Threshold Analysis		
Privacy Threshold Analysis		
PTA 01:	Point of Contact (POC) Name	Romanus Atanga
PTA 01A:	POC Title and Organization	System Security and Privacy Officer (SSPO)
PTA 01B:	POC Email Address	romanus.atanga@psc.hhs.gov
PTA 01C:	POC Phone Number	(202) 934-4028
PTA 02:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA 02A:	Describe in further detail any changes to the system that have occurred since the last PIA.	There have been no modifications to the module since the last PIA was completed.
PTA 03:	Is the data contained in the system owned by the agency or contractor?	Agency

PTA 04:	Please give a brief overview of the purpose of the system by describing what the functions of the system are and how the system carries out those functions in support of HHS.	The purpose of the Customer Agreement Module (CAM) is to improve data entry, agreement tracking, and streamlining the Program Support Center (PSC) billing process with the Budget Office (BO). CAM will be used in all aspects of the Service and Supply Fund (SSF). The SSF will utilize CAM to track all the agreements for which they are the service provider. This module allows the CAM users to create agreement and order records to record financial data, attach the funding documents to the record, add points of contact (POC), retrieve signatures of all responsible parties, and route the agreement to the BO. Upon receipt of all approvals and final agreement execution, agreement data is interfaced into the PSC Revenue Invoicing and Cost Estimation System (PRICES) as projects against which invoices can be created.
PTA 05:	List and/or describe all the types of information that are collected, maintained, and/or shared by the system regardless of whether that information is PII and how long that information is stored.	<p>CAM contains information related to Interagency Agreements (IAAs) where the servicing activity is a member of the Department of Health and Human services (HHS) SSF. This includes descriptions of the services to be rendered, pricing and appropriation information, contact information of the buying and selling agency, and information regarding federal officials providing their approval of the IAA. The POC information includes basic identity data, including name, email address, position title, federal agency, and phone number.</p> <p>Information is stored permanently in the CAM system per department of Health and Human Services (HHS) and National Archives and Records Administration (NARA) records retention policies.</p>
PTA 05A:	Are user credentials used to access the system?	No
PTA 06:	Describe why each type of information is collected, maintained, and/or shared by the system. Specify what information is collected about each category of individual.	<p>CAM uses the DocuSign electronic signature platform to acquire signatures on IAA forms. The data that is sent to DocuSign to facilitate this process includes POC names and email addresses and a PDF copy of the IAA, which includes the IAA data described previously. Upon agreement execution, the data that is transmitted to PRICES includes IAA data (amount, funding document numbers, IAA period of performance dates, and lines of accounting) and does not include any POC information.</p> <p>The individuals whose data is collected in CAM are federal employees providing IAA support services to the servicing activities. Data collected includes POC names, email addresses, position titles, federal agency, and phone numbers</p>
PTA 07:	Does the system collect, maintain, use, or share PII?	Yes
PTA 08:	Does the system include a website or online application?	No
PTA 14:	Does the system have a mobile application?	No
PTA 20:	Are any third-party websites or applications (TPWA) associated with the system?	No
PTA 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

Privacy Impact Assessment

Privacy Impact Assessment

PIA 22:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	<p>Biographical Information</p> <ul style="list-style-type: none"> Name Contact Information <ul style="list-style-type: none"> Email Address (Business) Phone Numbers (Business) Other <ul style="list-style-type: none"> Other
PIA 22A:	Identify the “other” type(s) of personally identifiable information (PII) not mentioned in the above list.	Position Title, Federal Agency
PIA 23:	Indicate the categories of individuals about whom PII is collected, maintained, or shared.	<p>Business Partners/Contacts (Federal state, local agencies)</p> <p>Employees/HHS Direct Contractors</p>
PIA 24:	Indicate the approximate number of individuals whose PII is maintained in the system.	500 – 4,999
PIA 25:	For what primary purpose is the PII used?	<p>The primary purpose of using Personal Identifiable Information (PII) in Customer Agreement Module (CAM) is to create CAM records (agreements), improve data entry, agreement tracking, and streamlining the Program Support Center (PSC)billing process with the Budget Office (BO). CAM application is used in all aspects of the Service and Supply Fund (SSF). The SSF will utilize CAM to track all the agreements for which they are the service provider.</p> <p>CAM uses the DocuSign electronic signature platform to acquire signatures on Interagency Agreement (IAA) forms. The data that is sent to DocuSign to facilitate this process includes Point of Contact (POC) names and email addresses and a Portable Document Format (PDF) copy of the IAA, which includes the IAA data described previously. Upon agreement execution, the data that is transmitted to PSC Revenue, Invoicing and Cost Estimation System (PRICES) includes IAA data (amount, funding document numbers, IAA period of performance dates, and lines of accounting) and does not include any POC information.</p> <p>The individuals whose data is collected in CAM are federal employees providing IAA support services to the servicing activities. Data collected includes POC names, email addresses, position titles, federal agency, and phone numbers.</p>
PIA 26:	Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).	There is no secondary use of the PII for testing, training, or research.
PIA 28:	Identify legal authorities, governing information use and disclosure specific to the system and program.	42 US Code, The Public Health and Welfare is the Title of the US Code that implements the Department of Health and Human Services (HHS) and provides it with the legal authority to operate.

PIA 29:	Are records in the system retrieved by one or more PII data elements?	No
PIA 30:	Identify the sources of PII in the system.	Government Sources Within the OPDIV Other HHS OPDIV Other Federal Entities
PIA 31:	Is there an Office of Management and Budget (OMB) information collection approval number?	No
PIA 31B:	Explain why an OMB information collection approval number is not required.	N/A. CAM does collect PII from authorized users in order to allow them to create agreements or perform tasks. However, the Office of Management and Budget (OMB) approval number is not applicable as no data pertaining the general public is collected.
PIA 32:	Is the PII in the system shared directly with other organizations outside the system's Operating Division?	Yes
PIA 32A:	Identify with whom the PII is shared or disclosed.	Other Federal Agency/Agencies Within HHS
PIA 32B:	For each disclosure, name the organizations/systems the system shares PII with and the purpose(s) of the disclosure.	The PII is used to contact approvers for interagency agreements serviced by members of the HHS SSF.
PIA 32C:	List any agreements in place that authorize the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	N/A - No external information-sharing agreements are required because the PII is used solely for internal business purposes within the IAA workflow. The individuals who receive the shared data are the same personnel who originally provided it to SSF for this specific purpose. The information is not transmitted to any external systems.
PIA 32D:	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.	PII is provided by users as part of the IAA approval process, and standard Business Operations procedures require this information to be accurate in order to complete the IAA workflow. Users must supply correct PII; otherwise, they are unable to route or approve IAAs. Additionally, System Administrators continuously monitor system activity to ensure accurate and efficient data processing and to identify any potential security risks or unauthorized access. These monitoring practices support the logging, tracking, and accounting of any sharing or disclosure of PII within the system.
PIA 33:	Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?	Voluntary
PIA 34:	Describe the method in place to notify and obtain consent from individuals whose PII will be collected. If no prior notice is given or consent cannot be obtained, explain why.	No explicit consent is obtained because it is considered implicitly granted when individuals choose to engage in the business. By providing their information, they acknowledge that their PII is collected and used for necessary business purposes.

PIA 35:	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). If they cannot be notified or have their consent obtained, explain why.	<p>No consent is obtained at the time of major system changes. CAM users are notified via email of all major changes including system maintenance and updates. Individuals can contact the WorkSmarter help desk by calling 301-492-4555 or emailing PSCWorkSmarter@psc.hhs.gov for any concern or questions they may have regarding system changes. The help desk then evaluates users' concerns and takes action accordingly</p> <p>A notification banner is also placed on the PSC WorkSmarter website in advance to notify users of upcoming downtimes for system upgrades or maintenance activities.</p>
PIA 36:	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.	<p>When appropriate, CAM users notify the Office of Secretary (OS) Chief Information Security Officer (CISO) to determine whether a security breach has occurred.</p> <p>Also, WorkSmarter help desk addresses all concerns regarding individuals' PII information. Individuals who are concerned about their PII being inappropriately obtained, used, or disclosed, or that the PII is inaccurate can contact the helpdesk by calling 301-492-4555 or emailing the PSC WorkSmarter help desk at PSC WorkSmarter@psc.hhs.gov. WorkSmarter helpdesk then investigates and escalate the issue to HHS Office of Information Security if required.</p>
PIA 37:	Describe the process in place for periodic reviews of the system to ensure the integrity, availability, accuracy, and relevancy of the PII in the system. Please address each element in your response. If no processes are in place, explain why not.	<p>CAM is not the system of records and has no process in place for periodic review of PII.</p> <p>PSC works with the OS Privacy office to periodically review PII's integrity, availability, accuracy, and relevancy.</p>
PIA 38:	Identify who will have access to the PII in the system.	<p>Users</p> <p>Administrators</p> <p>Developers</p> <p>Contractors</p> <p>HHS/OpDiv Direct Contractors</p>
PIA 38A:	Select the type of contractor.	
PIA 38B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes

PIA 39:

Provide the reason why each of the groups identified in 38 needs access to PII.

System administrators and developers with level 6 clearance have access to all data including PII in the system to provide system support and over all process improvement. However, they do not use PII to perform daily operations and maintenance activities. They may occasionally use PII for the purpose of testing and trouble shooting issues. System administrators and developers can be contractors.

CAM users who have access to PII are Federal Employees who have a Public Trust and HHS (Personal Identity Verification) PIV Cards. CAM users have role based access to the application. All data is visible to CAM users on a need to know basis. For example some CAM users only have the ability to view the CAM records and all the data associated while can create and submit CAM records for signature.

PIA 40:

Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

HHS restrictions, Rules of Behavior, Role Based Access Controls for Privileged users are in place with monitoring/logging and review processes to determine need to use, least privilege access for PII.

Only authorized system administrators/contractors with level 6 clearance have access to PII within the PSC WorkSmarter and It's child applications such as CAM and at the server level or have the ability to configure and make any changes within the application. The system has been designed to allow only the least system privileges necessary to perform specific system functions. Access authorizations and enforcements are managed through the Active Directory in computer management>system tools>local users and groups.

In Order to have access to CAM, each person must have passed background investigation and received a public trust and a HHS Personal Identity Verification (PIV) cards. In addition, these individuals must submit a request to access the information. Federal manager at PSC makes a final determination whether to grant this request or not.

Role Based Administrative Access Controls are in place within the application to only allow authorized CAM user to access the system.

<p>PIA 41:</p>	<p>Describe the technical methods in place to allow those with access to PII to access only the minimum amount of information necessary to perform their job.</p>	<p>Only authorized system administrators/contractors with level 6 clearance have access to PII within the PSC WorkSmarter application and at the server level or have the ability to configure and make any changes within the application. The system has been designed to allow only the least system privileges necessary to perform specific system functions. Access authorizations and enforcements are managed through the Active Directory in computer management>system tools>local users and groups.</p> <p>HHS restrictions, Rules of Behavior, Role Based Access Controls for users are also in place with monitoring/logging and review processes to determine need to use, least privilege access for PII.</p>
<p>PIA 42:</p>	<p>Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) to make them aware of their responsibilities for protecting the information being collected and maintained.</p>	<p>Each employee and HHS Direct Contractor must undertake HHS cybersecurity awareness, role based, and privacy trainings.</p>
<p>PIA 43:</p>	<p>Describe the training system users receive above and beyond general security and privacy awareness training.</p>	<p>CAM users receive Role Based trainings. All system users must complete Annual HHS Cybersecurity Awareness Training; the Rules of Behavior for Use of HHS Information Resources and sign the accompanying acknowledgement.</p> <p>PSC WorkSmarter team provides system trainings and online demonstrations for CAM users upon request.</p> <p>Variety of user manuals and instructions are also available to all CAM users.</p>
<p>PIA 44:</p>	<p>Describe the process and guidelines in place for the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).</p>	<p>The data will be maintained per General Records Schedule (GRS) 3.2. Item 010, Systems and data security record, 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/ Information Technology (IT) administrative purposes to ensure a continuity of security controls throughout the life of the system. System Administrators deactivate and remove user data periodically based on the Inactive Users Report received from office of the director management analysts.</p>

PIA 45:

Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.

PII information is secured by the CAM application which inherits its administrative, technical and physical controls from WorkSmarter. All data is stored in Appian Cloud, a Federal Risk and Authorized Management Program (FedRAMP) approved environment, which must ensure physical controls are in place. Also, administrative controls such as administrative process and procedure to obtain PIV Card, access to internal documentations, required for group and role membership; technical controls such as use of external system, information search and retrieval, data mining are in place. Physical controls such as Multi Factor Authentication (MFA) and physical access logs are in place. All access to CAM is through the WorkSmarter platform, which is encrypted with Transport Layer Security (TLS) certificates and communicates with the back-end data stores via Virtual Private Network (VPN) over the Trusted Internet Connection (TIC) hosted by the National Institutes of Health (NIH).

Review and Comments

OpDiv Privacy Analyst Review

Privacy Analyst Review Decision:	Approved	Privacy Analyst Review Date:	11/24/2025
Privacy Analyst Review Comments:	This PIA is ready for your review. All necessary questions have been answered. Thank you, Jon	# of Days - PA Review:	6

SOP Review

SOP Review Decision:	Approved	SOP Review Date:	11/24/2025
SOP Review Comments:		# of Days - SOP Review:	0

Agency Privacy Analyst Review

Agency Privacy Analyst Review Decision:	Approved	Agency Privacy Analyst Review Date:	12/1/2025
Agency Privacy Analyst Review Comments:	Reviewer: Nestor Villafuerte 12/1/2025 This PIA is ready for SAOP review and approval.	# of Days - APA Review:	7

SAOP Review

SAOP Review Decision:	Approved	SAOP Review Date:	12/9/2025
SAOP Review Comments:		# of Days - SAOP Review:	8

SAOP Signature					
Date	User	Type	Name	Original Value	New Value
12/9/2025 2:23 PM	BAUR, VANESSA	Signature	SAOP (Email PIN)		Content Signed

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PTA 06	Data Feed Service, pta_pia_OS_Release	11/14/2025	DocuSign is the name of the provider of cloud-based electronic signature technology.	
PIA 23	Data Feed Service, pta_pia_OS_Release	11/18/2025	Point of Contact (POC) information in CAM is restricted to federal employees. The system does not contain any PII of contractors.	
PTA 01	Data Feed Service, pta_pia_OS_Release	11/18/2025	<p>The system is contractor operated .</p> <p>Providing the response as a comment since the designated answer field did not allow editing / did not auto-populate for "General 05 - is the system or electronic information collection, agency or contractor operated?"</p>	