

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 - RPA-C - QTR2 - 2025 - OS2953283	PIA ID:	3609279
Name of Component:	OS - Robotic Process Automation Cloud	Name of ATO Boundary:	Robotic Process Automation System
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	42
Submission Status:	Submitted	Submit Date:	7/23/2025
Next Assessment Date:	N/A	Expiration Date:	1/1/2100
Office:		OPDIV:	OS
Security Categorization:		OpDiv PIA ID:	OS2953283
Legacy PIA ID:		Make PIA available to Public?:	No
1:	Identify the Enterprise Performance Lifecycle Phase of the system.		Test
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:	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 Interagency Uses
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	Update to PTA to include intra-agency agreement with Entra ID.
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.	Robotics Process Automation (RPA) is a low-code automation service that replicates user interactions for cross-performance repetition in order to reduce manual tense activities. The technology enables process owners to simply record, design, test, and deploy automations through designated Government Furnished Equipment (GFE). Process owners designate approve users to run the automation technology. RPA plays a vital role in reducing the amount of workload for federal agencies. Federal employees manage various tasks that may overwork their resources annually. RPA can reduce the amount of workload and hours by imitating a particular activity and enabling the resource to prioritize major agency goals. In return, federal employees can generate more productivity and accomplish more by doing less. Automation will increase the quality of deliverables and induce better accuracy relevant to the scope of work.
PTA - 5:	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.	The type of information that are "maintained and shared" are listed below. The information is NOT STORED in Orchestrator, but shared instead through the Active Directory (AD) synchronization process to operate:-Active Directory information (user accounts, user email addresses, and reporting agency)
PTA - 5A:	Are user credentials used to access the system?	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
PTA - 5B:	Please identify the type of user credentials used to access the system.	
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 information that are maintained and shared is needed to enable license and permission settings that will allow designated process owners to run the automation from their GFE laptop. For example, when an RPA system administrator goes into the RPA Orchestrator application, they will select and populate user accounts from the license settings page to apply the proper permission and allow the process owner to view and run the automation from their GFE laptop
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	Yes
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 website is the front-end portion of the RPA Orchestrator application and cannot be access publicly. The application URL is only accessible within the Information Technology Support Center (ITSC) network through VPN and only selected system administrators and engineers can access it. The purpose of the front-end portion website is to enable administrators to configure the user accounts, licenses, and automation repos for each project.
PTA - 10:	Does the website have a posted privacy notice?	Yes
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?	Yes

PIA		
PIA - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address User Credentials Other - Free text Field - Reporting OpDIV
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Employees/ HHS Direct Contractors
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	201 - 500
PIA - 4:	For what primary purpose is the PII used?	<p>The primary use of PII information is to regulate access and usage of the Robotic Process Automation System for the agency. The use enables users to access the automation provided by Robotic Process Automation Cloud to perform scripted actions to employ and manage information correctly to either various systems involved or directly for the user.</p> <p>There are currently no known AI use cases at the moment. We do believe in the future there will be more use cases that would benefit from a mix an AI plus RPA solution.</p> <p>The privacy impact assessment (PIA) will be updated to reflect any future AI use cases that that introduce new privacy risks. - As AI Use Cases are identified, as our best practice, we will not build, train, or develop any automation that requires using PII within a Large Language Model (LLM) or Machine Learning (ML).</p> <p>If a process requires PII to train a LLM, and there is simply no way around that, we will advise the business of needing to submit a PIA approval. For other AI use cases we would utilize Copilot which was included in the latest approved UiPath's FedRamp package as well as HHS OCIO has approved the usage of Copilot on 6/20/2025.</p>
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	There is no secondary use of PII.
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, Departmental regulations
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> <p>Email</p> <p>Government Sources</p> <p>Within the OPDIV</p> <p>Other HHS OPDIV</p>
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.	N/A
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.	To streamline data sharing across HHS OS OPDIVS to better service the growing customer IT ecosystems.
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)).	Memorandum of Understanding (MOU) with HHS and intra-agency agreement with Entra ID. Interconnection Security Agreements (ISA) is required to obtain relevant data via RPA Orchestrator application. These ISAs must be updated prior to Orchestrator application customers are able to obtain connectivity in Production.
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.	RPA Orchestrator authorized administrators will be able to access the Orchestrator application to monitor, analyze and capture logs of RPA Orchestrator application 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.	<p>The primary use of PII information is to regulate access and usage of the Robotic Process Automation System for the agency. The use enables users to access the automation provided by Robotic Process Automation Cloud to perform scripted actions to employ and manage information correctly to either various systems involved or directly for the user.</p> <p>Opting out would result in them not being granted access to RPA orchestrator or studio.</p>
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.	For general changes to the Robotic Process Automation System, we would notify users on the upcoming changes through mass email communication detailing the upgrades.
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.	Orchestrator only collects PII for the purposes of account access and authorization. If the process owner or stakeholder believes that the PII is inappropriately obtained, used, or disclosed or that the PII is inaccurate, RPA team members will investigate and redirect the process owner/stakeholder to the Active Directory (AD) team to resolve the concern. An email resource mailbox will be established for RPA. Users can email the RPA Office of Application and Platform Solutions (OAPS) RPA mailbox for questions regarding RPA (OAPS_RPA-C @hhs.gov)
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.	The process for periodic review(s) of PII is out of scope and not our responsibility to maintain. The Orchestrator system relies on the accuracy of the data provided from AD.
PIA - 17:	Identify who will have access to the PII in the system.	Administrators
PIA - 17A:	Select the type of contractor.	
PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	
PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	The system administrator(s) will need to see the users' first and last name including email address in order to configure their license settings to run the automation from their Government Furnished Equipment (GFE).

PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The administrative procedures are as followed: System Administrators are selected to perform standard system procedures (such as user account and license configuration) to enable the use of the automation. System administrators are the only users allowed to access the system for standard procedures.
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.	The technical methods in place includes minimal share of user information (coming from the Active Directory) to allow the system administrators to perform their job(s).
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 system administrators are required to complete the "Introductory Role-Based Training for IT Administrators" along with submitting their certificate of completion before they are granted access to the Orchestrator system. All system administrators are required to complete this training annually.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	All system administrators are required to complete the "Introductory Role-Based Training for IT Administrators", along with receiving an approved Tier 4 investigation, and may include an elevated account request to the system for additional configuration. All system administrators are required to comply with additional security and privacy awareness training as well.
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).	<p>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.</p> <p>UIPath will also maintain audit logs and will dispose of them after 2 years.</p>

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: The system will secure PII through role-based and rule based access controls and permissions which are set at the account level and at the folder level. The Active Directory will only share limited information (First Name, Last Name, Email Address) in the Orchestrator system to enable system administrators to perform their designated role. The only elements/ fields shared from the Active Directory will be "First Name", "Last Name", "Email Address". Multifactor authentication will also be enabled prior to go live.

Technical: PII is encrypted in transit and at rest. PII captured within an automation is also obfuscated.

Physical: The system is a software as a service system, but physical controls are in place within the Microsoft Azure data centers.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	7/23/2025
Privacy Analyst Comments:	Hi Vanessa, This PIA is ready for your review. All necessary questions have been answered. Thank you, Muriel.	Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:		SOP Review Date:	7/23/2025
		SOP Days Open:	0

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	8/6/2025
Agency Privacy Analyst Review Comments:	Reviewer: Crystal Bland 8/6/2025 This PIA was already review and approved outside of the tool due to sync issue. We now can approved in the Archer tool.	Agency Privacy Analyst Days Open:	14

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature Page.docx
SAOP Comments:	Approved on behalf of the SAOP	SAOP Review Date:	8/6/2025
		SAOP Days Open:	0

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
7-30-2025 EMAIL_RE RPA-C PIA review.msg	60416	.msg	8/6/2025 3:17 PM	0
7-30-2025 RPA-C_PTA_PIA_CB.rtf	800593	.rtf	8/6/2025 3:17 PM	0
7-30-2025 RPA-C_PTA_PIA_Signed.docx	71629	.docx	8/6/2025 3:17 PM	0
EMAIL_RE_OS AI Review_VB.pdf	180324	.pdf	8/6/2025 3:17 PM	0

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 11C	Data Feed Service, piafmos_Maintenance	7/9/2025	In PTA - 2A, you stated that, "Update to PTA to include intra-agency agreement with Entra ID". However, Entra ID is not mentioned in the PIA. Kindly update your response accordingly.	
PIA - 4	Data Feed Service, piafmos_Maintenance	7/10/2025	<p>In addition to what is already listed in this response, because you indicated the system will be using AI feature in PTA - 21, we have some additional information we would like you to include in this response field.</p> <p>Please include the following key factors in your response(s):</p> <ul style="list-style-type: none"> • Please describe, to the best of your ability, any known AI use cases. • Please include the following statement "The Privacy Impact Assessment (PIA) will be updated to reflect any future AI use cases that introduce new privacy risks." • Please indicate if the AI tool will be trained using the PII collected in the system. <p>If you have any questions, please reach out to us and we can assist.</p>	

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:	8/6/2025 3:20 PM	History Log:	View History Log
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