

## 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 - SPS - QTR1 - 2025 - OS2340041	<b>PIA ID:</b>	2835497
<b>Name of Component:</b>	OS - OS - Secretary Policy System	<b>Name of ATO Boundary:</b>	Secretary Policy System
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	25
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	3/3/2025
<b>Next Assessment Date:</b>	N/A	<b>Expiration Date:</b>	3/10/2028
<b>Office:</b>		<b>OPDIV:</b>	OS
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	OS2340041
<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)?		Yes
<b>4:</b>	ATO Date or Planned ATO Date.		10/12/2025
<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.	PIA Validation (PIA Refresh)
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	There have not been any significant changes to the system since the last PIA, though we have had a change of system owner and business owner.
<b>PTA - 3:</b>	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 Secretary's Policy System (SPS) is a cloud-based platform using Salesforce Service Cloud and Communities. It tracks all incoming correspondence for the Secretary and facilitates the clearance of all policy documents (memos, regulations, reports to congress, etc.) which require Secretary-level clearance and approval. It provides the Health and Human Service (HHS), Immediate Office of the Secretary (IOS) holistic insight into engagement with stakeholders. The Secretary Policy System applications leverage complex routing rules and facilitate dynamic approval processes to ensure all applicable stakeholders are involved in the document approval process. The application contains large volumes of historical and current data that must be appropriately archived as official records of the department.

<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>The Immediate Office of the Secretary's Secretary Policy System (SPS) tracks all incoming correspondence for the Secretary and facilitates the clearance of all policy documents memos, regulations, reports to congress. Types of documents include Regulatory Development, Planning and Budgeting, Public Affairs, Legislation Tracking, General Information, Workplace Policy Development and Management, Organization and Position Management, Record Retention and Disaster Preparedness and Planning. Types of PII maintained in the system include name, e-mail address, phone numbers, mailing address, user credentials (username, HHS ID).</p> <p>Information is stored and then transferred according to National Archives and Records Administration (NARA) requirements: For Permanent Records (SPS cases from: 3/13/2015- Present), NARA DAA-0468 2011-0006-0001 - (Supersedes HHS/OS Handbook, Item 100-01 A &amp; B) Cut off at the end of an Administration when the files were created. Transfer legal custody of electronic records to the NARA - 30 years after cutoff (December 2050)</p>
<p><b>PTA - 5A:</b></p>	<p>Are user credentials used to access the system?</p>	<p>Yes</p>
<p><b>PTA - 5B:</b></p>	<p>Please identify the type of user credentials used to access the system.</p>	<p>HHS User Credentials HHS/OpDiv PIV Card</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.

Types of information collected and maintained in Secretary Policy System include data associated with program evaluation, program monitoring, policy and guidance development, public comment tracking, regulatory creation, official information dissemination and congressional liaison operations. Information, pertaining to individuals collected in the system, includes email addresses and/or mailing addresses, as provided in incoming correspondence. The system also contains contact records created, populated, and maintained via an Application Programming Interface (API) integration with the Department of Health and Human Services' (HHS) Access Management System (AMS) global address system. Contact records are populated with name, account name, username (if applicable), email, and phone number (when available). Contact information that is required for a reply on correspondence cases is shared at the case and assignment level with the Strategic Work Information Folder Transfer System (SWIFT) users integrated correspondence management system, which is used by Health Resources and Services Administration (HRSA), Assistant Secretary for Financial Resources (ASFR), and Centers for Medicare and Medicaid Services (CMS); as well as with the Office of the Assistant Secretary for Health (OASH) SPS salesforce correspondence management system users and Administration for Community Living's (ACL's) correspondence management system user (ACL CFMS) hosted on the salesforce platform.

<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?	Yes
<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.	<p>The Secretary's Policy System (SPS) is a cloud-based platform using Salesforce Service Cloud and Communities. It tracks all incoming correspondence for the Secretary and facilitates the clearance of all policy documents (memos, regulations, reports to congress, etc.) which require Secretary-level clearance and approval. It provides the Health and Human Service (HHS), Immediate Office of the Secretary (IOS) holistic insight into engagement with stakeholders.</p> <p>URL is in a public domain, but only activated users with HHS provided PIV card, or HHS users with username, password, and salesforce authenticator (MFA requirement) are able to login to access the system (<a href="https://hhsoes.lightning.force.com">https://hhsoes.lightning.force.com</a>)</p>
<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?	No
<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 User Credentials Other - Free text Field - username; password (users may set a unique password that is stored in the system, but is not viewable or accessible)
<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 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?	Contact information is required to reply to correspondence.
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	Not Applicable
<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 regulations
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	No
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	
<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.	
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains Hard Copy Mail/Fax Email Government Sources Other HHS 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.	Not Applicable
<b>PIA - 11:</b>	Is the PII shared with other organizations outside the system's Operating Division?	Yes
<b>PIA - 11A:</b>	Identify with whom the PII is shared or disclosed.	Within HHS
<b>PIA - 11B:</b>	Please provide the purpose(s) for the disclosures described in PIA - 11A.	SPS users from OpDIV/StaffDIV require contact information in order to send direct reply responses to correspondence.
<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)).	Incoming correspondence that enters the system via email or is scanned into the system may contain names, emails and/or addresses. Since this correspondence is sent directly to the secretary, there is no agreement for the sender to sign. Their correspondence is shared with opdivs/staffdivs as appropriate in order to draft an appropriate response.
<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.	Not Applicable
<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.	Individuals who write to the Secretary provide their Personal Identifiable Information (PII) on a voluntary basis (name, email and/or mailing address and or phone number) and no Privacy Act Statement (PAS) is provided at the time of submission or sent in response to their inquiry.
<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.	PII is only collected when individuals supply their information via correspondence/inquiry to the Secretary. Submitters' PII will not be used for a purpose materially different from the purpose given at the time of collection.
<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.	Secretary Policy System internal users are able update contact record information when needed.
<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.	Contact record information is reviewed and updated when new correspondence is received from an existing contact.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Users
<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.	Internal users create and maintain correspondence records; Gatekeepers for OpDiv/StaffDiv are responsible for replying to direct reply correspondence and thus need access to contact information in order send a reply.
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	All potential system users must be approved by the deputy executive secretary before being activated as users with access to the system.
<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.	Profiles, roles, and permission sets are used to support zero trust (access to only the minimum amount of information necessary for a user to perform their job).
<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.	There is a warning/awareness banner displayed on login to the system. Users must also complete Health and Human Service (HHS) required security training annually (e.g. Annual HHS Cybersecurity Awareness Training)
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	Secretary Policy System refresher trainings are provided on a monthly basis to internal users. Training sessions are offered to all new users.
<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).	For Permanent Records (SPS cases from: 3/13/2015- Present), NARA DAA-0468-2011-0006-0001 - (Supersedes HHS/OS Handbook, Item 100-01 A & B) Cut off at the end of an Administration when the files were created. Transfer legal custody of electronic records to the NARA – 30 years after cutoff (December 2050).
<b>PIA - 24:</b>	Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.	Multifactor Authentication (MFA)/Single Sign On (SSO) required to access the system; zero trust / access to minimum information required to do job enforced via profiles, roles, and permissions sets.

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	3/3/2025
<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>	3/5/2025
		<b>SOP Days Open:</b>	2

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	3/7/2025
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Nestor Villafuerte  3/7/2025 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>	3/11/2025
		<b>SAOP Days Open:</b>	4

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
RE OS - SPS - QTR2 - 2024 - OS2075528.msg	301056	.msg	3/7/2025 10:40 AM	0

## Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmos_Release	3/3/2025	Please include 'Name' in this selection as well.	
PIA - 24	VILLAFUERTE, NESTOR	3/6/2025	Please describe the physical controls used to secure the PII within the system.	
PIA - 1	BLAND, CRYSTAL	3/7/2025	Per OS email, "It is covered under the previous ATO date of 11/16/2022 and planned for renewal in October of this year."	

## 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:	3/11/2025 9:10 AM	History Log:	<a href="#">View History Log</a>
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