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

Status:	Approved	**PIA ID:**	1078775
PIA Name:	HRSA - SWIFT - QTR1 - 2020 - HRSA580713	**Title:**	HRSA - Strategic Work Information and Folder Transfer System
OpDIV:	HRSA		

PTA

PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance
PTA - 1B:	Is this a FISMA-Reportable system?	Yes
PTA - 2:	Does the system include a website or online application?	No
PTA - 3:	Is the system or electronic collection, agency or contractor operated?	Agency
PTA - 3A:	Is the data contained in the system owned by the agency or contractor?	Agency
PTA - 5:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
PTA - 5A:	If yes, Date of Authorization	10/9/2019
PTA - 6:	Indicate the following reason(s) for this PTA. Choose from the following options.	New
PTA - 8:	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 Strategic Work Information and Folder Transfer (SWIFT) Correspondence System is an electronic document management system being

		used for the following types of documents and actions: Regulations, Reports to Congress, Correspondence, Memoranda to the Secretary, Deputy Secretary, Chief of Staff and Executive Secretary, Briefings for the Secretary, Deputy Secretary, and Chief of Staff and Invitations to the HRSA Administrator. The SWIFT Inter-Agency Agreement System is an electronic document management and workflow system for managing the routing/processing/signing of Inter-Agency Agreements. The SWIFT Freedom of Information Act (FOIA) System is an electronic document management and workflow system that will process various FOIA requests received by the FOIA office. It will permit the vast majority of documents to be collected, reviewed and/or mailed as PDF's.
PTA - 9:	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 system collects and maintains the following types of documents and actions: Regulations, Reports to Congress, Correspondence, and Memorandum to the Secretary, briefing, Inter-Agency Agreements and FOIA request Secondary PII such as SSN, Name, Driver's License Number, E-Mail Address, Education Records, Date of Birth, Mail address, Financial Account Info, Legal Documents, Military Status and Employment Status are collected as part of FOIA request and correspondences. SWIFT is used by all Bureaus and Offices throughout the Agency as a means of increasing the efficiency of the controlled correspondence process.
PTA -9A:	Are user credentials used to access the system?	Yes
PTA - 9B:	Please identify the type of user credentials used to access the system.	HHS User Credentials HHS Email Address HHS Password HHS Username HHS/OpDiv PIV Card
PTA - 10:	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 Strategic Work Information and Folder Transfer (SWIFT) is an electronic document management and workflow system for managing

		Inter-Agency Agreements FOIA and agency correspondence. The system uses the following types of documents and actions: Regulations, Reports to Congress, Correspondence, and Memoranda to the Secretary, briefing, Inter-Agency Agreements and FOIA request
		Secondary PII such as SSN, Name, Driver's License Number, E-Mail Address, Education Records, Date of Birth, Mail address, Financial Account Info, Legal Documents, Military Status and Employment Status are collected as part of FOIA request
		SWIFT is used by all Bureaus and Offices throughout the Agency as a means of increasing the efficiency of the controlled correspondence process.
		SWIFT is not a public-facing system. SWIFT does not collect information about system users/administrators in order to control access to the system. Users (HRSA employees and direct contractors) access SWIFT with their HRSA credentials. SWIFT uses Windows Active Directory to authenticate all users.
PTA - 10A:	Are records in the system retrieved by one or more PII data elements?	Yes
PTA - 10B:	Please specify which PII data elements are used.	To be completed upon review
PTA - 11:	Does the system collect, maintain, use or share PII?	Yes
PIA		
PIA - 1:	Indicate the type of PII that the system will collect or maintain	Social Security Number
		Name
		Driver's License Number
		E-Mail Address
		Education Records
		Military Status
		Date of Birth
		Mailing Address
		Financial Account Info
		Legal Documents
		Employment Status
		User Credentials
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
		Public Citizens
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system	Above 2000
PIA - 4:	For what primary purpose is the PII used?	SWIFT is used to track responses and

		correspondence, which can include providing information, policy interpretations, responses to journalistic inquiries, and many other kinds of correspondence.

PII may be shared with appropriate points of contact in order to respond to the correspondence. Correspondence may include inquiries, requests for resolution of concerns, or any other matter. The information is shared with offices within the Department of Health and Human Services (HHS) who may be able to assist in appropriately responding to correspondence sent to the Secretary or FOIA requests received by HRSA.

SWIFT is also used to track and fulfill requests received under the Freedom of Information Act (FOIA). The primary purposes for which PII is used are to document and analyze requests received from individual requesters or that seek records about individuals, locate responsive records about individuals, verify the identity of individual requesters, contact requesters, locate cases in the system (e.g., to manage cases or provide status information to requesters), process responsive records containing PII, maintain clean, marked and redacted versions of the processed records, and document responses to requests, including fee issues. |
| **PIA - 5:** | Describe any secondary uses for which the PII will be used (e.g. testing, training or research) | Secondary uses of the PII are to identify requests from the same requester or that seek records about the same individual(s). |
| **PIA - 6:** | Describe the function of the SSN/Taxpayer ID. | SSN may be contained in some of the requests (even though we discourage its inclusion) and in some of the pre-existing agency records processed for release under FOIA using the system.

SSN is rarely needed because other information almost always exists that can serve the same functions. The functions would be to verify the requester's identity, locate responsive records, or distinguish between records about individuals with the same name and associate records that are under different names but are about the same individual--but only when no other information will suffice as an alternative to using SSN. |
| **PIA - 6A:** | Cite the legal authority to use the SSN | 5 U.S.C. 552 (FOIA) and 5 U.S.C. 552a (Privacy Act), which impliedly permit or require use of enumerators or other identifying information as necessary to provide individual requesters with access to their records while avoiding inadvertently releasing records to an individual requester that are about a different individual; see also Executive Order (E.O.) 9397 as amended by E.O.13478. |
| **PIA - 7:** | Identify legal authorities, governing information use and disclosure specific to the system and program | 5 U.S.C. § 301, 5 U.S.C. 552, and 5 U.S.C. 552a, and Departmental Regulations. |

PIA - 8:	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.	Secretariat's CORR Control System: 09-90-0037 Tracking Records and Case Files for FOIA and Privacy Act Requests and Appeals: 09-90-0058
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains Hard Copy Mail/Fax Email Government Sources Within the OPDIV Other HHS OPDIV State/Local/Tribal Foreign Other Federal Entities Other
PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	Information in the system does not require answers to any questions and is not collected in a specific format that will require the Office of Management and Budget information collection approval.
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	Yes
PIA - 10A:	Identify with whom the PII is shared or disclosed and for what purpose	Within HHS
PIA - 10A (Justification):	Explain why (and the purpose) PII is shared with each entity or individual.	Within HHS: To route and process correspondence and requests, records and report data containing PII, verify identity of FOIA requesters, and locate records pertaining to particular individuals. Other Federal Agency/Agencies: To effect FOIA consultations and referrals involving individual requesters and/or requested records containing PII. Private Sector: To comply with the submitter notice process with respect to financial or commercial records containing PII - this process shares with the submitter the records that the submitter originally provided to HHS but may also share the identity of the FOIA requester.
PIA - 10C:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII	The SWIFT system maintains an accounting of disclosures in that the dates, nature, purpose, names and addresses of each correspondence is captured by the system. Additionally, responses to FOIA requests are exempt from this requirement per 5 USC 552a (c)(1).)
PIA - 11:	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason	Individuals who make inquiries to HRSA are automatically documented in SWIFT. Currently there is no prior notice given to inform the inquirer

		that their name, phone number, and address sent to HRSA will be logged into SWIFT due to their inquiry.
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 13:	Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason	SWIFT does not request PII from individuals and individuals can choose which contact information to provide. However, individuals are given the opportunity to opt-in to the collection of their information when they send PII themselves in the correspondence and requests provided through the system. As a result, no need to provide an opt-out methods. Information is used for the purposes for which individuals request that it be used, which is to address concerns or request responses to inquiries and requests. If a person opts out of providing his/her name and/or organization, the name does not appear on these documents, and is labeled as "anonymous" for action. An individual whose PII is in records responsive to a FOIA request has no option to object to the inclusion of the records in the system.
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	Major changes would need to be reflected in the System of Records Notice (SORN), which would be available to the public.
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	Individuals receive responses from appropriate points of contact (POCs) in response to their correspondence. If their concerns include the use of PII, the POC would assist in resolving complaints regarding PII use as well.

An individual's concern that his/her PII was inappropriately released to a FOIA requester would be reported within HHS as a privacy incident and would be analyzed to determine if an improper disclosure occurred; the concern would be responded to in writing; and remedial measures would be taken if an improper disclosure occurred.

Although this system is exempt from the Privacy Act "accounting of disclosures" requirement, an individual can make a FOIA request for the FOIA request log to identify any individuals and entities requesting records about him/her, a description of the records requested, and the dates of the requests. |
| **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 | Information is used transactionally and there would be no value to periodic reviews and updates. |
| **PIA - 17:** | Identify who will have access to the PII in the system and the reason why they require access | Users

Administrators

Contractors |
| **PIA - 17A:** | Provide the reason of access for each of the groups identified in PIA -17 | |

Users: HHS correspondence and FOIA staff, including liaisons in the Bureaus and Offices will have access to PII pertaining to files they handle.

Administrators: User account maintenance and correspondence assignments and processing.

Contractors: These contractors are direct contractors that operate on behalf of the agency and use the agency's credentials when doing so to perform system administration.

PIA - 17B:	Select the type of contractor	HHS/OpDiv Direct Contractor
PIA - 18:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	The SWIFT Administrators and developers are contractor employees who do not enter information into SWIFT. Only Government employees (users) review the correspondence received to enter PII into the system. System administrators and developers who are contractors will be able to see PII (name, organization and phone numbers) of users for account creation and troubleshooting problems only.
PIA - 19:	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	System users are granted only the access necessary to perform their jobs. This level of access is granted based on each user's position description as identified on the employee's Official Form-8. In addition, the system is designed based on set permissions; therefore, employee access and use are based on their need to know. A user will only have access to their SWIFT folders and documents that have been sent to them as information only by the authoring agency.
PIA - 20:	Identify training and awareness provided to personnel (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	Annual HHS Mandatory Cybersecurity Information Systems Security Awareness and Privacy Awareness training are required and documented as completed yearly by all HRSA and Contractor users of SWIFT. In addition, prior to accessing the system each employee must accept the rules of behavior prior to accessing their computer system that gives them access to SWIFT. Administrators of SWIFT are also required and documented as have taken the Role-Based Training.
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	Users of the FOIA module receive specialized training on a regular basis at FOIA/PA conferences and workshops hosted by HHS, Dept of Justice, and outside vendors providing advanced instructions and guidance regarding safeguarding personal privacy information and avoiding improper disclosures of PII in particular contexts and with respect to specific types of records.
PIA - 23:	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific NARA records retention schedule(s) and include the retention period(s)	Records are maintained indefinitely using the records management schedule. Hardcopies of correspondence are sent to a Retention Center.

		The authority is DAA-0468-2011-0006-0003 and the Master Files are permanent. Cut off of at the end of the fiscal year in which correspondence was created or received. Transfer to the National Archives in 4-year blocks immediately after cut off. National Archives and Records Administration (NARA) is determining the appropriate Records Control Schedule (RCS) Job Number for all of the PII maintained in the system and the PII should be maintained until a determination is provided. The applicable records schedule for the FOIA module is GRS 4.2, Information Access and Protection Records (formerly GRS 14); it prescribes retention periods ranging from approximately 2 years to 6 years after the date a case is closed. The system will be updated when a case is closed, will calculate when case records are eligible for destruction, and will generate a report of eligible cases each year, for use in deleting eligible electronic records and shredding eligible paper files.
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	Official Correspondence files are permanent and the retention authority is HRSA DAA-0512-2014-004-0061. The cut-off date for these records is at the end of the calendar year in which the file is created and files are transferred to the National Achieves in 5-year blocks, 15 years after the cut-off. General Correspondence files are temporary and the retention authority is HRSA DAA-0512-2014-004-0062. The cut-off for these records at the end of the calendar year in which the file is created and files are destroyed 7 years after the cut-off. FOIA request files are temporary and the retention authority is GRS 4.2, Information Access and Protection Records (formerly GRS-14). It prescribes retention ranges from approximately 2 years to 6 years after the date a file is closed.
PIA - 26:	Does the website have a posted privacy notice?	Yes
PIA - 27:	Does the website use web measurement and customization technology?	No
PIA - 28:	Does the website have any information or pages directed at children under the age of thirteen?	No
PIA - 29:	Does the website contain links to non-federal government websites external to HHS?	No