

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: HRSA - DSG (COVID) - QTR3 - 2020 - HRSA615797
PIA ID: 1192652

Name of ATO Boundary:
 HRSA - DocuSign

PTA

PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Initiation
PTA - 1B:	Is this a FISMA-Reportable system?	No
PTA - 2:	Does the system include a website or online application?	Yes
PTA - 2A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	
URL Details		
Type of URL	List Of URL	
Publicly accessible website with log in	https://account.docusign.com	
PTA - 3:	Is the system or electronic collection, agency or contractor operated?	Contractor
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	4/20/2020
PTA - 5B:	If no, Planned Date of ATO	
PTA - 6:	Indicate the following reason(s) for this PTA. Choose from the following options.	New
PTA - 7:	Describe in further detail any changes to the system that have occurred since the last PIA	Not Applicable

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?

DocuSign Federal is a SaaS application oriented towards federal government entities. Operated and managed as a government community cloud, DocuSign Federal provides government customers with an enterprise signing service to facilitate paperless workflow management. The DocuSign application will be used for processing of Care Act Provider Relief Funds to Health Care Providers

<https://www.hhs.gov/provider-relief/index.html>.

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.

(1) Contact Person Name

- (2) Contact Person Title
- (3) Contact Person Phone Number
- (4) Contact Person Email
- (5) Applicant Type
- (6) Number of facilities
- (7) Beds for all facilities
- (8) Total number of FTE
- (9) CMS Certification Number (CCN), if applicable
- (10) Gross Revenues
- (11) Fiscal year of Gross Revenues
- (12) Percentage of Gross Revenue from Patient Care
- (13) Lost Revenues due to COVID-19
- (14) Increased Expenses due to COVID-19
- (15) Upload Gross Revenues Worksheet (if required)
- (16) Upload Federal Tax Form
- (17) Medicare Part A + B
- (18) Medicare Part C
- (19) Medicaid
- (20) Commercial
- (21) Self-Pay
- (22) Other Government Payer
- (23) Other
- (24) Total
- (25) Total Amount received from Treasury SBA / PPP for Filing TIN and subsidiary TINs as of 5/31/2020
- (26) Total of payments received from FEMA for Filing TIN and subsidiary TINs as of 5/31/2020:
- (27) Primary Provider FTE under filing TIN as of 5/31/2020
- (28) Non-Primary Provider FTE under filing TIN as of 5/31/2020
- (29) Other FTE under filing TIN as of 5/31/2020

(30) Number of Locations as of 5/31/2020

(31) Upload FTE Worksheet

(32) Upload IRS Form 941 for Q1 2020

(33) Bank Name

(34) ABA Routing Number

(35) Account Holder Name

(36) Account Number

The information will be stored in DocuSign until the system administrator execute the deletion of data.

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.	Non-HHS User Credentials Email address Password Username
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	

HRSA's Office of Information Technology (OIT) facilitated Coronavirus Aid, Relief, and Economic Security (CARES) Act Provider Relief Fund payments to healthcare providers leveraging DocuSign and a rapidly developed Enterprise DataMart payment solution. The process enabled the distribution of \$20B to health care providers in a fast and transparent manner.

The process involves external users - hospital providers who will be receiving funds - and internal users – HRSA and HHS users who facilitate the payment process.

Providers access HHS Site and click on the Provider Relief Find link. They will be navigated to the CARES Act Provider Relief Fund Payment Attestation Portal powered by United Healthcare Group.

As a first step to initiate the process, the system will validate whether a provider is eligible for the CARES Provider Relief Fund. Providers are required to enter prerequisite information, including a reference number as proof of fund receipt, and related information.

Once a provider submits required data and completes the UnitedHealth Group (UHG) application, they will be redirected to the Authentication page in DocuSign. On completing the authentication process, they will be directed to the CARES Act Provider Relief Fund Application in DocuSign.

Several fields will automatically populate on the form. This is based on the providers' entry on the UHG Microsite. Up to 20 Business Tax Identification Numbers (TINs) will automatically populate in the application.

Details like federal tax classification, exempt payee code, account information, Medicare or Medicaid ID, etc. need to be entered by the providers.

The fields in the Revenue section are dynamic and will populate based on the Providers selection in Federal Tax Classification.

Once the form is completed and signed, DocuSign will create an aggregated file and HHS/HRSA users will be able to download the file on a nightly basis. Data will be encrypted at rest and downloaded/transferred via DocuSign Retrieve Tool.

DocuSign generates the file and pushes it to an authoritative Simple Mail Transfer Protocol (SMTP) location on HRSA/HHS site from where it can be downloaded.

PTA - 10A:	Are records in the system retrieved by one or more PII data elements?	No
PTA - 10B:	Please specify which PII data elements are used.	
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	Name E-Mail Address Phone numbers Taxpayer ID Mailing Address Financial Account Info
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
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?	DocuSign only targets PII data fields related to the CARES Act Provider Relief Fund Application. PII is used to validate financial eligibility to be accepted to receive federal grants funding.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research)	DocuSign does not use PII for testing training or research
PIA - 6:	Describe the function of the SSN/Taxpayer ID.	Applicants must enter their Tax ID Number (TIN) for validation in the Provider Relief Fund Application and Attestation Portal Up to 20 Business TINs will automatically populate in the application. This is based on the Providers entry of Business TINs in the Microsite.
PIA - 6A:	Cite the legal authority to use the SSN	NA
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	NA
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.	NA
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains Email Online
PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	Form Approved OMB #0990-0379
PIA - 9B:	Identify the OMB information collection expiration date.	8/31/2023
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	No

PIA - 10A (Justification):	Explain why (and the purpose) PII is shared with each entity or individual.	Justification for PIA is to provide an Emergency Financial Aid Grant to Providers who meet the eligibility requirements, who acknowledge negative financial impact by the COVID-19 pandemic, and who agree to utilize their grant award for qualified expenses.
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	No additional notification is given to individual. All PII information collected is necessary as part of the HRSA CARES Act Provider Relief
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	It is not possible to opt-out. All PII information collected is necessary as part of the HRSA CARES Act Provider Relief
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	When a HRSA CARES Act Provider subscribes to the DocuSign Federal system, the Provider is consenting to the collection and use of their information. Noted in DocuSign Privacy Policy.
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	There is no process, as individuals are notified at the time they submit the information stored in DocuSign that it will be used for legitimate purposes and it will not be disclosed unless authorized by law.
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	Daily review is used to maintain accuracy of data.
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users Administrators
Provide the reason of access for each of the groups identified in PIA -17		
Users: Users require access to PII data in order review and analysis HRSA CARES Act Provider request		
Administrator: DocuSign provides limited PII-level access to DocuSign personnel authorized to access the DocuSign Federal system for operational, maintenance, security, and customer support purposes. DocuSign roles that have access to the DocuSign Federal system include Product Security, Security Operations, Technical Operations, and Customer Support. DocuSign personnel only have access to PII relating to eDocument transactional information for customer support purposes.		
PIA - 17A:		
PIA - 18:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	Provider completes the UGH Web Form and are redirected to the <u>CARES Act Provider Relief Fund Application</u> in DocuSign Providers enter their <u>name</u> and <u>email</u> in the designated fields. The Providers are moved to the next step DocuSign COVID employs multiple mechanism to prevent the misuse of PII by those having access. The only accessible PII information is eDocument transaction records which include information regarding the sender and recipients (name and email address). This eDocument transaction record is only accessible by HRSA DocuSign administrator who are given the eDocument Transaction ID by the HRSA Human Resources system owner. All PII information within a DocuSign Envelope (eDocument) is encrypted with DocuSign staff not having physical or logical access.

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	DocuSign provides limited PII-level access to DocuSign personnel authorized to access the DocuSign Federal system for operational, maintenance, security, and customer support purposes.
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	DocuSign does not require all DocuSign COVID users to undergo annual awareness and security training (including privacy training) access to the DocuSign.
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	System users receive training related to their job responsibilities in addition to security and privacy awareness training. Security and privacy awareness training is conducted annually. Job training is provided as needed.
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)	DocuSign establishes retention periods for PII within the DocuSign Federal system. PII within DocuSign envelopes and envelope-transactional data is stored as long there is a business purpose within the system for audit, legal, and customer use.
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	DocuSign Federal system is considered restricted, confidential, and sensitive, in accordance with DocuSign information classification standards. DocuSign Federal provides consistent information flow protections for all customer data permitted within DocuSign Federal, regardless of sensitivity level. Federal user entities are responsible for ensuring that no information with a security impact level greater than moderate is stored, processed, or transmitted via the services provided to them.
PIA - 25:	Describe the purpose of the web site, 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	DocuSign COVID does not have a web site. Access is granted through a separate system the Coronavirus Aid, Relief, and Economic Security (CARES) application.
PIA - 26:	Does the website have a posted privacy notice?	No
PIA - 27:	Does the website use web measurement and customization technology?	No
PIA - 27A:	Select the type of website measurement and customization technologies is in use and if it is used to collect PII	
PIA - 28:	Does the website have any information or pages directed at children under the age of thirteen?	No
PIA - 28B:	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?	
PIA - 29:	Does the website contain links to non-federal government websites external to HHS?	No