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 - FNMS - QTR1 - 2020 - OS503591	**PIA ID:**	1113133

Name of ATO Boundary:

OS - Foreign National Management System

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?	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
Other	The publicly available URL (https://fnmsform.hhs.gov) is only active and available to the user who received the email invitation from FNMS. FNMS generates a unique identifier per visitor which is included in the URL.
HHS Intranet (HHS Internal)	fnms.hhs.gov

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)?	No
PTA - 5A:	If yes, Date of Authorization	
PTA - 5B:	If no, Planned Date of ATO	3/13/2020
PTA - 6:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)

PTA - 7:	Describe in further detail any changes to the system that have occurred since the last PIA	None
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?	FNMS is the sole system to enter foreign visitor/foreign national information. This information is vetted through various law enforcement and intelligence community databases to protect HHS personnel, information and assets in order to meet the requirements of numerous laws, orders, policies, and regulations. The system is used to record and track non-U.S. Citizen visits. Forms requesting access and instructions for vetting foreign visitors are located at https://fnms.hhs.gov
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.	FNMS will collect and maintain the following personally identifiable information (PII) data for foreign nationals: First and Last Name Date of birth Gender Birth Location (Country/Province/State) Phone Number Mailing address Email address Photographic Identifier Passport Number Visa Information The PII is collected once a Foreign Visitor initiates a request to visit an HHS facility. The information is maintained In Accordance With (IAW) HHS policy.
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 Password HHS 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	The Foreign National Management System (FNMS) is an enterprise wide web application used by Health and Human Services (HHS) Operating Divisions (OpDivs) and Staffing Divisions (StaffDivs) to enter and track foreign national visits to HHS facilities worldwide. FNMS collects and maintains the following personally identifiable information (PII) data for foreign nationals: First and Last Name Date of birth Gender Birth Location (Country/Province/State) Phone Number Mailing address Email address Photographic Identifier Passport Number Visa Information
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.	Name, Date of Birth (DOB), Passport number,

		Visa information, Photo, Address. E-mail
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 Date of Birth Mailing Address Passport Number Others - Gender, Place of Birth, Photo, Visa information
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?	The primary purpose of the Personally Identifiable Information (PII) will be to identify and validate foreign visitor's access to HHS facilities.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research)	There are no secondary uses of the PII.
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	The implementation of this system, including activities such as the collection of PII necessary for operating it, are authorized by 5 U.S.C. 301. 42 U.S.C § 3502 creates the Office of the Assistant Secretary for Administration (ASA) at the Department of Health and Human Services (HHS), and among the duties delegated to the Assistant Secretary for Administration (ASA) are oversight of these services, which are necessary to developing and maintaining a workforce. 31 U.S.C. 66a; 5 U.S.C. 5501 et seq., 5525 et seq., 5701 et seq., and 6301 et seq.; Executive Order 9397; Pub. L. 100–202, Pub. L. 100–440, and Pub. L. 101–509 Also, the Foreign National Management System (FNMS) allows HHS to meet the requirements of Presidential Policy Directive (PPD) -21, the Counterintelligence Enhancement Act of 2002, and Executive Order 13587 – National Insider Threat Policy.
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.	09-90-0777 Facility & Resource Access Control Records
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains In-person

Hard Copy Mail/Fax

Phone

Email

Online

Government Sources

Within the OPDIV

Other HHS OPDIV

PIA - 9A:	Identify the OMB information collection approval number or explain why it is not applicable.	Because FNMS does not collect PII from members of the general public, an Office of Management and Budget information collection approval number and expiration date is not applicable.
PIA - 9B:	Identify the OMB information collection expiration date.	
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	Other Federal Agency/Agencies State or Local Agency/Agencies
PIA - 10A (Justification):	Explain why (and the purpose) PII is shared with each entity or individual.	In order to conduct background checks and vet foreign national visitors before allowing access to HHS facilities and resources.
PIA - 10B:	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement, Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	N/A
PIA - 10C:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII	N/A
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	Prior to arriving at HHS, a Foreign Visitor will receive a system generated email requesting them to access the FNMS system and provide personal information. Upon accessing the site, a disclosure statement is displayed informing the Foreign Visitor that providing personal information is voluntary and is needed prior to visiting any HHS facility. Since this information is voluntarily submitted, the Foreign Visitor is aware of the information being collected.
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	There is no option for a Foreign Visitor to opt-out of the collection of their PII if they desire to visit a HHS facility. The individual must understand that they must be identified and their information validated in order to gain access. Individuals will have awareness of how their information will be used. In the event a visitor decides to opt-out of providing PII they will not be granted access to HHS facilities.
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	The System of Record Notice (SORN) describes some of the ways the records will be used within the agency and some of the reasons why the records may be disclosed to parties outside the agency.

		If the system changes in a way that will conflict with the SORN, a new or revised SORN will be published in the Federal Register providing a 30-day public notice comment period.
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	An individual can contact HHS' Office of Public Affairs if they believe their PII has been inappropriately obtained, used, or disclosed at the following website: www.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	On an annual basis the current list of users will be provided to the business owner, Office of National Security (ONS), for review and validation. The list will be provided through a secured method, in accordance with HHS security guidance. The FNMS system owner, Office of the Chief Platform Officer/Platform Development Division (OCPO/PDD), will make necessary updates as requested by business owner (ONS). Foreign national's PII is not reviewed periodically to ensure the data's integrity, availability, accuracy and relevancy. The PII for the foreign national is only validated during the scheduled visit. In event a foreign national revisits a HHS facility the visitor will be required to resubmit their PII for the new visit.
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users Administrators Developers Contractors Others

Provide the reason of access for each of the groups identified in PIA -17

HHS Designated users have role-based access to information depending on which Operational Division (OpDiv) or Staff Division (StaffDiv) they work for, and their job function and appropriate documentation.

Application Administrators in the chain of command grant approval for requested role-based access received through a user provisioning system.

Developers respond to requests to add functionalities or make other changes

Direct Contractors may develop code if code or configuration changes are needed.

Requesters, Approvers, and FNMS Guards require PII access because the Requester is responsible for completing the request form for the foreign national. The Approver is responsible for approving access to HHS facilities. The FNMS Guard checks the foreign national visitor in upon arrival at point of entry.

PIA - 17A:		
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	Access rights are determined by need to know basis when the user requests access. An annual recertification process is conducted to make sure user roles have not changed. The current recertification process in place states that there will be a system generated email that will be sent to all user accounts requesting them to re-certify by email to ONS that they still have a role that requires access to FNMS. ONS will review accounts and roles and provide the responses to OCPO/PDD with any modifications to the list of users and associated roles.
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	User Identification Passwords Firewall Encryption Intrusion Detection System (IDS)
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	Information Systems Security Awareness and Privacy Awareness training are required annually. In addition, the HHS Rules of Behavior must be acknowledged and signed before access is granted.
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	FNMS training is offered by HHS' OCPO/PDD staff.
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)	The scheduling and retention of data collected is a requirement for the FNMS system under the HHS Records Management and Disposition guidelines. The records will be retained and disposed of in accordance with National Archives and Records Administration's (NARA) General Records Schedule 2 (GRS 2).
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	The following administrative, technical, and physical controls are in place for FNMS: Administrative Controls:

System security plan
Contingency (or backup) plan
File backup
Back-up files stored offsite
User manuals
Security Awareness
Training
Contractor Agreements
Least Privilege Access
PII Policies

Technical Controls:
User Identification
Passwords
Firewall
Encryption
Intrusion Detection System (IDS)

Physical Controls:
Guards
Identification Badges
Key Cards

The system is secured by methods prescribed in the System Security Plan (SSP). The SSP calls for system life-cycle practices for federal systems. The methods employed include risk assessments and implementation of management, operational, and technical controls.

In the Security Authorization process; National Institutes of Standards and Technology 800-53 Rev. 4 security controls and established the required level of security measures, including end user IDs, passwords, group accounts, a certified facility, background screening on system administrators will be utilized. The security controls will be reviewed annually, at a minimum.

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	The publicly available URL (https://fnmsform.hhs.gov) is only active and available to the user who received the email invitation from FNMS. FNMS generates a unique identifier per visitor which is included in the URL.
PIA - 26:	Does the website have a posted privacy notice?	Yes
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