

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

06/22/2017

OPDIV:

HRSA

Name:

Adobe Connect

PIA Unique Identifier:

P-6436694-911930

The subject of this PIA is which of the following?

Major Application

Identify the Enterprise Performance Lifecycle Phase of the system.

Development

Is this a FISMA-Reportable system?

No

Does the system include a Website or online application available to and for the use of the general public?

No

Identify the operator.

Contractor

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

No

Describe the purpose of the system.

Adobe Connect is an Enterprise web conferencing solution used as an agency collaboration tool for online meetings, eLearning, and webinars.

With Adobe Connect, you can create online meetings and virtual classroom using powerful multimedia tools, including live video streams, integrated audio, interactive simulations, and virtual breakout rooms.

Adobe Connect broadcasts audio in meeting or training sessions using Voice over Internet Protocol (VoIP) and the microphone on attendees' computer system. Adobe Connect supports the following solutions for adding audio to meeting and training sessions:

Built-in VoIP

Adobe Connect broadcasts audio in meetings or training sessions using VoIP and the microphones on attendees' computer systems.

Universal Voice Audio Providers

Universal voice audio providers enable Adobe Connect to broadcast all telephone-based audio into an Adobe Connect meeting room over VoIP. Both account administrators and hosts can configure audio conferencing providers for universal voice

Integrated Telephony Adaptors without Universal Voice

This solution provide communication between Adobe Connect and specific audio conferencing provider (PGi). Integrated adaptors have advanced call capabilities, allowing hosts control the audio conference from the meeting. HRSA end-users currently leverage the Universal Voice Audio Provider option by using Verizon telephony services to broadcast audio for all meeting and training. As part of a modernization effort, HRSA Adobe Connect instance will offer Integrated Telephony Adaptor as an option.

Describe the type of information the system will collect, maintain (store), or share.

For Adobe Connect participants (guest, HRSA user, HRSA meeting organizer, HRSA host), the system collects and maintains the person's name and email address. The system can also be used to record, store and share meetings hosted by Adobe Connect, to include the voice and video of individuals from within the meeting.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

Adobe Connect is a collaboration tool that can be leveraged to provide the HRSA community with the capability for hosting virtual meeting; to include audio, video and application sharing, and agency related trainings.

Adobe Connect system collects and maintains the user's name and email address, Adobe Connect account credentials, to authenticate the level of access the user will be allowed to the system. The content presented (documents, voice and video) during an Adobe Connect meeting can be recorded and shared for later viewing by participants that missed the original meeting.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Name

E-Mail Address

User Credentials

Meeting Recordings (voice and video of individual participants)

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Employees

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

The primary purpose for the PII is for accessing Adobe Connect.

Describe the secondary uses for which the PII will be used.

The secondary PII usage is for tracking training completion.

Identify legal authorities governing information use and disclosure specific to the system and program.

5 USC 301, Departmental regulations

Are records on the system retrieved by one or more PII data elements?

No

Identify the sources of PII in the system.

Email

Online

Government Sources

Within OpDiv

Identify the OMB information collection approval number and expiration date

Not Applicable

Is the PII shared with other organizations?

No

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

Individual users of the Adobe Connect service are presented with the HHS standard System Use Notification. The Banner is located on the HRSA Adobe Connect portal landing page.

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

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 method for an individual to opt-out of the collection or use of their PII (name and email address) because the information is required for a user account to access the Adobe Connect service.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

The HHS standard System Use Notification (Warning Banner) discloses to the users that they are providing consent by using the system.

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.

Incidents can be reported to the Incident Response Team (IRT). The IRT mitigate the risks associated with the inadvertent loss or unapproved disclosure of personally identifiable information (PII).

The IRT participates in the investigation and resolution of incidents. To mitigate a reported issue, the IRT may request assistance from the appropriate human resources office or contractor representative. The IRT shall determine what actions need to be taken, and they shall be responsible for completing the investigation of the employee's case in conjunction with other appropriate departmental offices.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

HRSA's Adobe Connect Team follows the Standard Operating Procedure (SOP), Adobe Connect Account Management, to manage user accounts and the periodic review of PII data (name and email address).

Adobe Connect Administrators are responsible for Account Management which includes:

Complete quarterly reviews on the Adobe Connect accounts to determine if accounts are no longer required.

Granting access to authorized users to the appropriate Adobe Connect group

Enabling, modifying, disabling, and removing accounts

Only registered users have access to the Adobe Connect system.

Identify who will have access to the PII in the system and the reason why they require access.

Users:

To invite participants to hosted meeting using the individuals name listed in the system. The user has to be a member of a built in group to create/ invite meetings.

Administrators:

Adobe Connect Administrators: to create, manage and monitor Adobe Connect user accounts

Contractors:

The Cloud Service Providers (CSP) are direct contractors and provide the hosted environment for the HRSA Adobe Connect instance. The CSP has access to the system PII and provides maintenance support and Tier III support for the system. No CSP PII data is protected by the FedRAMP boundaries and are not viewable by HRSA Adobe Connect account holders.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

Adobe Connect has built-in groups for managing the different level of access a user is allowed to the system. Only members of the built-in groups can access a user's PII (name and email address and recording of a hosted meeting, to include the voice and video of individuals). Users, Administrators and Contractors can be added as a member of any of the built-in groups.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

HRSA's Adobe Connect Support team has direct access to manage the Adobe Connect application. Adobe Connect has nine built-in permission groups, each associated with a different level of privilege.

The only PII information collected and stored in the Adobe Connect system is a user's name and email address. This information is used by other Adobe Connect users to select and invite participants to scheduled meetings and trainings.

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.

All HRSA personnel is responsible for completing an annual Information Security and Privacy Awareness

Describe training system users receive (above and beyond general security and privacy awareness training).

Not Applicable

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

Yes

Describe the process and guidelines in place with regard to the retention and destruction of PII.

GENERAL RECORDS SCHEDULE 3.2: Information Systems Security Records (DAA-GRS-2013-0006-0004)

ITEM 31 - System access records. These records are created as part of the user identification and authorization process to gain access to systems. Records are used to monitor inappropriate systems access by users. Includes records such as: user profiles, log-in files, password files, audit trail files and extracts, system usage files, cost-back files used to assess charges for system use

Systems requiring special accountability for access. These are user identification records associated with systems which are highly sensitive and potentially vulnerable.

Destroy 6 years after password is altered or user account is terminated, but longer retention is authorized if required for business use.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Only approved HRSA resources have access to login to the Adobe Connect portal via a secure protocol using HTTPS. The Adobe Connect service is provided by a Cloud Service Provider (CSP) in a FedRAMP certified environment.

Administrative Control: system account management Standard Operating Procedure (quarterly account review to determine user, ticketing system to request an Adobe Connect account. Management approval to request an Adobe Connect Account), security training required before receiving a user account;

Technical Control: the system requires user authentication, all communications happens over secure ports, scheduled vulnerability scanning to prevent unauthorized access;

Physical Control: System is installed in a Single tenant model, physical access to the environment is limited to authorized personnel and is monitored 24X7 by physical security personnel.