Privacy Impact Assessment (PIA): FDA - Help Desk - QTR4 - 2020 - FDA1851020

Date Signed: 10/25/2021

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:**	1290175
PIA Name:	FDA - Help Desk - QTR4 - 2020 - FDA1851020	**Title:**	FDA - OC Administrative Applications
OpDIV:	FDA		

PTA

PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance
PTA - 1B:	Is this a FISMA-Reportable system?	No
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)?	No
PTA - 5B:	If no, Planned Date of ATO	11/15/2019
PTA - 7:	Describe in further detail any changes to the system that have occurred since the last PIA	Since the previously completed Privacy Impact Assessment (PIA) the FDA decommissioned the Performance Management Appraisal Program (PMAP) and it is no longer part this PIA. FDA has also revised the scope of this PIA to consolidate assessment of the Help Desk, Dockets Repository, and International Travel Management elements of the system.
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 FDA collectively employs AdminApps to securely and efficiently operate FDA property, resources, and administrative and reporting

		systems. This PIA assesses 8 specific applications. Help Desk: This Help Desk permits senior AdminApps administrators to provide roles and levels of access for administrators of specific applications. It centralized the function of awarding role-based access to AdminApps applications.
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.	AdminApps contains information necessary for the Agency to securely and efficiently operate FDA resources and administrative programs. With the exception of Food and Drug Administration Amendments Act of 2007 (FDAAA)-Food and Drug Administration Safety and Innovation Act (FDASIA), all of the applications addressed in this PIA (DR, FR, Awards, Office Moves, ePortal, Public Calendar, Help Desk and ITM) contain work contact-related PII. This PII includes name, work e-mail address, mailing address and work phone number. FR might also store non-employee (member of the public) PII (e.g., name). Help Desk contains names of FDA staff with administrative roles; information about the subagency (center) and division for whom the individual works; and levels of access granted. Help Desk additionally stores authentication information (usernames and passwords).
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/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	AdminApps contains information necessary for the Agency to securely and efficiently operate FDA resources and administrative programs. With the exception of Food and Drug Administration Amendments Act of 2007 (FDAAA)-Food and Drug Administration Safety and Innovation Act (FDASIA), all of the applications addressed in this PIA (DR, FR, Awards, Office Moves, ePortal, Public Calendar, Help Desk and ITM) contain work contact-related PII. This PII includes name, work e-mail address, mailing address and work phone number. FR might also store non-employee (member of the public) PII (e.g., name). Help Desk permits senior AdminApps administrators to provide roles and levels of access for administrators of specific applications. It centralizes the function of awarding role-based access to AdminApps applications. Help Desk contains names of FDA staff with administrative roles; information about the subagency (center) and division for whom the individual works; and levels of access granted. Help Desk additionally stores authentication information (usernames and passwords).
PTA - 10A:	Are records in the system retrieved by one or more PII data	Yes

	elements?	
PTA - 10B:	Please specify which PII data elements are used.	AdminApps contains information necessary for the Agency to securely and efficiently operate FDA resources and administrative programs. With the exception of Food and Drug Administration Amendments Act of 2007 (FDAAA)-Food and Drug Administration Safety and Innovation Act (FDASIA), all of the applications addressed in this PIA (DR, FR, Awards, Office Moves, ePortal, Public Calendar, Help Desk and ITM) contain work contact-related PII. This PII includes name, work e-mail address, mailing address and work phone number. FR might also store non-employee (member of the public) PII (e.g., name). Help Desk permits senior AdminApps administrators to provide roles and levels of access for administrators of specific applications. It centralizes the function of awarding role-based access to AdminApps applications. Help Desk contains names of FDA staff with administrative roles; information about the subagency (center) and division for whom the individual works; and levels of access granted. Help Desk additionally stores authentication information (usernames and passwords).
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 Military Status Foreign Activities Date of Birth Photographic Identifiers Mailing Address Employment Status Passport Number Others - The PII checked above is all work contact information for FDA employees.; User Credentials
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared	Employees/ HHS Direct Contractors Public Citizens

		Other - NOTE: Employees includes Direct Contractors. FR might also maintain non-employee (Public Citizen) PII that individuals commenting on a public notice shared as part of their comment. Such submissions are voluntary and FDA's Federal Register publications inform individuals of the procedures for commenting on a notice and advise submitters that submitted comments are made public.
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 PII is used for internal administrative and reporting activities, personnel management functions, and to maintain the security of Agency IT systems and physical property.
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	The implementation of these applications is authorized by 5 U.S.C. 301 which permits agency heads to create the usual and expected infrastructure necessary for the organization to accomplish its purposes and mission. In addition, the security and privacy measures of the applications are required by the Federal Information Security Management Act (FISMA) and the statutes underlying OMB Circular A-130 for the secure and efficient use of government systems and resources.
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains Online Government Sources Within the OPDIV Non-Government Sources Members of the Public
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	No
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	FDA personnel (employees, Direct Contractors, fellows, etc.) are notified at the time of hire and consent to the submission and use of their

		personal information as a condition of employment. FDA center representatives, and the various individuals involved with the specific data collection and use provide notification to the employees and non-employees at the time the data is requested. For some applications, external individual submitters (i.e., non-employees) were notified on forms they submitted; these applications are no longer used. Other methods of notification include Federal Register publications (e.g., comment submission guidance and SORNs), privacy statements on FDA.gov and other resources provided on FDA.gov. FDA's Federal Register notices also often inform individuals of the procedures for commenting on a notice and advise that submitted comments may be published in full, including PII and any other information submitters choose to include in their comments.
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 method for employees to opt out of submitting their PII. Permanent employees, Direct Contract employees, fellows and other personnel must provide their PII in order for the Agency to process administrative materials and securely administer access to Agency information and property. External individuals submitting comments to the Federal Register are not mandated to submit any PII. External individual (non-employees) submitters were notified on forms they submitted (no longer in use), in Federal Register publications (e.g., comment submission guidance and SORNs), privacy statements on the FDA.gov and in other resources provided on FDA.gov. FDA's Federal Register notices inform individuals of the procedures for commenting on a notice and advise that submitted comments may be made public.
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	No major changes are planned or anticipated. If a major change in the collection and use or sharing of PII data for these applications occurs, users will be notified via individual e-mail notification, FDA-wide e-mail and/or in updated notice statements on submission forms and Federal Register publications.
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	FDA personnel may resolve such concerns by contacting the appropriate system administrator, FDA's Employee Resources, and Information Center (ERIC) or the Computer Security Incident

		Response Team (CSIRT). Any changes to an individual's name or address would need to be updated using a Standard Form 50 or 52, which is the process used to make such changes used by all FDA employees, and the data would be updated in the separate human resources information system. External individuals may use any of a number of avenues to raise concerns, including contacting FDA offices through FDA.gov (phone, mail, mail and by using information provided on forms submitted by individuals. External individuals submitting comments to the Federal Register are not mandated to submit any PII. FDA's Federal Register notices consistently inform individuals of the procedures for commenting on a notice and advise submitters that submitted comments are published in full, including PII and any other information submitters choose to include in their comments.
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	FDA relies on its personnel to ensure the accuracy and integrity of the information entered into these applications. FDA personnel are responsible for providing accurate information and may independently update and correct their information at any time. FDA lacks a reference model to periodically check the integrity and accuracy of the PII of external submitters but provides avenues to ensure all information is as complete, accurate, timely, and relevant as possible. Information related to external submitters is corrected in the course of use and/or at the request of the individual. External individuals submitting comments to the Federal Register are not mandated to submit any PII. FDA's Federal Register notices consistently inform individuals of the procedures for commenting on a notice and advise submitters that submitted comments are published in full, including PII and any other information submitters choose to include in their comments. Integrity and availability are protected by the appropriate security and privacy controls selected from the National Institute of Standards and Technology's (NIST's) Special Publication 800-53, as determined using Federal Information Processing Standard (FIPS) 199.
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users Administrators Developers Contractors
PIA - 17A:	Provide the reason of access for each of the groups identified in PIA -17	

	Users: Require access to the system in order to assign and track assignment. Note that "users" may include subject individuals, supervisors, or business function administrators. Administrators: Administrators may be application administrators who require access to to conduct business functions, or application administrators who require access in order to create and manage user accounts for specific applications. Developers: Developers will not normally have access to PII but may in the course of maintaining the systems or providing technical assistance. Contractors: Some developers may be Direct Contractors and will have access under the same circumstances as developers.	
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	Users who require access to the application need to have supervisor approval and sign off before access is granted. The user's supervisor will use an account creation form to specify the minimum application access that is required in order for the user to complete his/her job. The agency reviews the access list for the application on a quarterly basis to review and adjust users' access permissions, and to remove unnecessary accounts from the application.
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	Management establishes roles for individual personnel, with role-based restrictions permitting access only to information that is required for each individual to perform his/her job.
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	All system users at FDA complete annual mandatory computer security and privacy awareness training. This training includes guidance on Federal laws, policies, and regulations relating to privacy and data confidentiality, integrity, and availability, as well as the handling of data (including any special restrictions on data use and/or disclosure). The FDA Office of Information Management and Technology (OIMT) verifies that training has been successfully completed.
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	Help links are available within applications, and instructional materials are available on the FDA intranet for all applications with the exception of FDAAA-FDASIA. All users are instructed on adhering to the HHS Rules of Behavior in the context of their work involving this system. For additional privacy guidance, personnel may contact the Agency's privacy office. Privacy program materials are available to personnel on a central intranet page. Personnel may take advantage of information security and privacy awareness events and workshops held within FDA.
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)	Office Moves application records are retained under General Records Schedule (GRS) 11, Items 1 and can be destroyed after two years.

		Awards application records are retained under GRS 10-12a1 and can be destroyed after two years. FR application records are retained under GRS 23-8 and can be destroyed when 2 years old, or 2 years after the date of the latest entry. Records retained under 2631a can be transferred to National Archives and Records Administration (NARA) 30 years after cutoff while those under 2631b can be destroyed 30 years after cutoff. ePortal data is retained under NARA Citation N1-88-04-03, and data is retained only until EASE accepts changes and updates to its data files, and data is superseded and deleted. Public Calendar application records are retained under GRS 23-5 (Schedules of Daily Activities) and will be destroyed or deleted when two years old (see also NARA schedule N1-GRS-87-19 item 5a). All records from the ITM application are retained under FDA File Code 9371c, issuing office copies of transportation related records, which includes "travel authorizations and supporting documents." Records are retained for six years after the period of the account. NARA citation is General Records Schedule 9-1c. Dockets Repository records are retained under FDA file codes 2631a (NARA approved citation N1-88-04-2) and 2631b (NARA approved citation N1-88-04-2). Records retained under 2631a can be transferred to NARA 30 years after cutoff while those under 2631b can be destroyed 30 years after cutoff. Helpdesk records are retained under FDA file code 9901 and General Records Schedule (GRS) 3.1 item 001. The records disposition is temporary, and the records are destroyed/deleted after 5 years, but they may be kept longer if needed for business 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	Administrative safeguards include user training; system documentation that advises on proper use; implementation of Need to Know and Minimum Necessary principles when awarding access, and others. Technical Safeguards include that PII entered via these systems is immediately pulled through the web-based systems into internal systems not connected to the web, removed from the public site, and not accessible to others submitting information via these systems or fda.gov. Physical controls include that all system servers are located at FDA facilities protected by guards, locked facility doors, and climate controls. Other appropriate controls have been selected from NIST's Special Publication 800-53, as determined using Federal Information Processing Standard (FIPS) 199.