US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:
06/30/2022

OPDIV:
ACF

Name:

Career Pathways Extended Follow-up Studies (CPE)

PIA Unique Identifier:
P-1556141-082109

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

Indicate the following reason(s) for updating this PIA.

Describe the purpose of the system.
The ACF Office of Planning, Research, and Evaluation (OPRE) oversees a large portfolio of research on career pathways programs; the major components of this portfolio are the Pathways for Advancing Careers and Education (PACE) project and evaluations of two rounds of the Health Profession Opportunity Grants Program (HPOG 1.0, HPOG 2.0). All three evaluations used surveys and administrative data to measure how program services impacted participants' education, earnings, employment, and other life outcomes at multiple time points.

OPRE is supplementing the HPOG 2.0 Evaluation with an additional project focused on HPOG study participants who enrolled after the onset of the COVID-19 pandemic in early 2020 (the HPOG 2.0 National Evaluation COVID-Cohort Study). The project will focus on participants' employment and education activities, use of program services, and overall well-being in relation to the pandemic.

CPE will continue to study the individuals and grantees who participated in the four prior projects. It will examine long-term impacts on educational progress, labor market outcomes, and family well-

being approximately five to six years after enrollment for HPOG 2.0 participants, and nine to ten years after enrollment for PACE and HPOG 1.0 participants. Administrative earnings and education data will be collected for all study participants, and survey data collected for a subset of HPOG 2.0 participants.

This system will maintain all information collected during the prior four studies (PACE, HPOG 1.0, HPOG 2.0, and HPOG COVID) and the information needed for CPE.

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

The system will collect the information needed to complete CPE.

The system may collect PII about participants from several sources, all of which can be linked to the individual participants:
• It may collect the information originally acquired from participants during PACE, HPOG 1.0, HPOG 2.0, and HPOG COVID. This may include their name, date of birth, social security number, contact information (e.g., phone number, address, email), study participants' child names and dates of birth, and results from prior surveys and data matches.
• It may collect individual-level data originally collected by the Participant Accomplishment and Grant Evaluation System (PAGES), a participant tracking and management system that includes data on participant characteristics, engagement in programs, and training and employment outcomes
• For HPOG 2.0 participants who are selected to complete the long-term follow-up survey, it may collect their updated contact information (name, phone number, address, email) and the contact information of other people who might be able to reach them (e.g., phone number, address, email).
• For HPOG 2.0 participants who complete the long-term follow-up survey, CPE may collect information about their income, self-employment earnings, industry and occupation, employee benefits, quality of life, general well-being, their children's school performance and well-being, and other aspects of their life.
• For all study participants, it may collect various secondary data about the participants including information from the (a) National Directory of New Hires (NDNH) about their employment and earnings and (b) National Student Clearinghouse (NSC) about their educational history.

The system may collect a variety of non-PII (i.e., deidentified) information originally collected from grantees who participated in PACE, HPOG 1.0, HPOG 2.0, and HPOG COVID. This may include:
• Grantee-level and Program-level data reported in the PAGES system on programs and services offered.
• Interviews with grantee staff, which may include information on administration of the program, key program services and activities, collaboration among stakeholder representatives, and perceptions of the program.
• Interviews with employers and other stakeholders, which may include feedback of the overall healthcare labor market, firm-specific conditions and training practices, and their perceptions of and experience with HPOG.
• Interviews with instructors and case managers, which may include information about their background, job responsibilities, program experiences, and perceptions of the program.

The system may collect PII from the individuals who log into the system to manage and record their activities within the system. This may include their name, user name, and activities within the system.

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

The data will be stored inside a secure data collection and analytical computing cloud built to securely collect and analyze data at the Federal Information Security Management Act (FISMA)

moderate level. This secure enclave is used to gather individual data via surveys (phone, in person, and/or web), gather secondary data sources, and evaluate the results.

The data will be kept temporarily for the project as defined by contract language and aligns with ACF and National Archives and Records Administration (NARA) retention policies. The data is not shared outside of personnel working on the contract or ACF.

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

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

Participant characteristics

User name of staff and contractors who access CPE

Participant education and Employment information

Prior survey results and data matches

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

How many individuals' PII is in the system?
50,000-99,999

For what primary purpose is the PII used?
Personally Identifiable Information (PII) about the study participants is used for three purposes: (1) to maintain contact with study participants selected for long-term interviewing; (2) for contacting study participants for survey data collection; and (3) to match records from one source to records from another source (e.g., surveys to administrative data).

PII about the staff logging into the system is used to track and audit their usage of the system.

Describe the secondary uses for which the PII will be used.
There are no secondary uses for the PII outside of the ACF Program Office and programs listed.

Identify legal authorities governing information use and disclosure specific to the system and program.
42 U.S.C. 1397g(a) - Demonstration projects to address health professions workforce needs.

Section 1110 of the Social Security Act (42 USC 1310).

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

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.
09-80-0361, OPRE Research and Evaluation Project Records

Identify the sources of PII in the system.

    Identify the OMB information collection approval number and expiration date

        0970-0462 Second Generation of the Health Profession Opportunity Grants Program (HPOG 2.0); expires on July 31, 2024.

Is the PII shared with other organizations?

    Yes

    Identify with whom the PII is shared or disclosed and for what purpose.

    Describe any agreements in place that authorizes the information sharing or disclosure.

        The evaluation contractor has entered into Data Use Agreements with the National Student Clearinghouse (NSC) to obtain data on participant school enrollment and credential receipt. The evaluation contractor will send participant names, SSNs, and DOBs to NSC for matching. NSC destroys the PII data upon completion of the data match.

        OPRE has MOUs with the Office of Child Support and Enforcement (OCSE) to obtain quarterly employment and earnings data from the NDNH for PACE, HPOG 1.0, and HPOG 2.0. The evaluation contractor will send participant names and SSNs to NDNH for matching. NDNH destroys the PII data within 60 days of upload.

        The evaluation contractor has a data use agreement with the US Census Bureau to provide survey responses on job responsibilities for matching to the Census Bureau's industry and occupation classifications (no PII is included in this match).

        OPRE intends to enter into a data use agreement with the Internal Revenue Service (IRS). Discussions are still in process, so the exact details are not available yet. Tentatively, the team will send participant names, SSNs, dates of birth, treatment status, and grantee/program indicators. The IRS will return aggregate deidentified data calculated from those individuals.

    Describe the procedures for accounting for disclosures.

        The PII in the system will be accessed only by personnel with authorization to view the data. All intended disclosures of this information will be documented via a contract, Memorandum of Understanding (MOU), or similar.

        In the event of an unintended disclosure, the Incident Response Plan will be activated. This existing Plan includes the procedures to follow including notifying ACF, OPRE, and Department of Health and Human Services (HHS) of any security incidents.

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

    All individuals participating in CPE were previously part of either the PACE, HPOG 1.0, and/or HPOG 2.0 evaluations. When they joined that study, they were provided consent forms which explained the study, the requirements of participation, risks and benefits, and the data collection requirements. Most participants signed a physical copy of the form; a small number of HPOG 2.0 study participants who enrolled during the pandemic were verbally consented.

    For HPOG 2.0 participants selected to complete the long-term follow-up survey, all documents

requesting information from the individual (e.g., surveys) remind the individual that the collection is voluntary and include a brief summary of the privacy protections for this project.

The staff who are given access to the system are informed their PII will be collected and used for this purpose when they first join the project.

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.
Study participants have the opportunity to call or email the evaluation contractor to opt out of the study. They received this contact information in their consent from and in quarterly contact information update mailer forms.

Staff who do not want their information in this system will not have access to the system.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.
Enrollment of study participants was conducted under the prior projects (PACE, HPOG 1.0, and HPOG 2.0). All individuals received information about the project, via the consent and other forms, when they originally enrolled.

We do not anticipate any major changes occurring during the course of this project. However, if we do need to notify study participants, we will notify them using their most recent contact information. For HPOG 2.0 participants selected to complete the long-term follow-up survey, there is a process in place to maintain contact with participants (e.g., asking them to update their contact information on a quarterly basis). That same contact information would be used to notify the participants about the change. For PACE, HPOG 1.0, and HPOG 2.0 study participants who are not selected to complete the long-term follow-up survey, we would use contact information that was collected under the prior projects.

The staff with information in the system would be emailed via the email associated with their account.

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 a participant believes that their PII has been inappropriately obtained, used, disclosed, or is incorrect, they can notify the project team via the contact information provided in their consent form or in the quarterly contact information update mailer forms. The individual can either call the response number provided or go to the website to make the contact. Study participants also have the Institutional Review Board's (IRB's) toll-free number to call if they have concerns about improper usage of data or their rights as a study participant. If a participant contacts the project vendor with a concern, the vendor and ACF together will conduct an investigation and reach a resolution including whether to remove or correct the information in this database and/or any other databases (where the data originally resides).

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.
The PII of the participants will be reviewed for accuracy as part of the initial contact process by comparing the data to other data sets. Additionally, the participants will be contacted regularly to remind them to keep their data up to date. The other PII in the system is related to the individuals who are using the system directly (users).

Data Integrity is ensured through role-based access control which limits the number of privileged users that can view or change PII. Log files are maintained for any changes that occur within the system and are monitored for changes.

Data availability is handled by the infrastructure. The system is hosted inside a cloud environment which provides high availability using multiple availability zones, creating redundancy. The data is backed up on a daily basis.

Data Accuracy is ensured through built in quality control standards requiring all data to be entered in a correct and usable format. The individual user will ensure that their name and contact information is correct when the account is first created.

Data Relevancy is maintained by following the specific retention schedules as required by NARA.

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

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

Access to PII is restricted only to those participants who need it. For example:

• Survey interviewers, managers, and individuals who work in the call center where participants can lodge complaints (Call Center Personnel) need access to names, contact information, and Date of Birth (DOB) for validation purposes;

• Analysts need access to PII (name, DOB, and SSN) for matching to administrative data sources:

• Analysis staff have access only to deidentified data.

The Project Director must approve everyone who receives access to a project folder containing PII and the folder(s) that they can access.

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.

The entire system restricts access to PII using privileges assigned to their system account. For example:

- Only individuals identified as Administrators have access to manage accounts belonging to other individuals.

 - Call Center Personnel only have access to the systems that they need to perform their work.

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 project personnel with access to CPE receive general security awareness training, and personnel with significant information security roles receive role-based security training, at least (a) before they receive access to the system, (b) when there are major changes to their role or system, and (c) on at least an annual basis. Since this is a contractor owned contractor operated system, all project personnel are hired by the contractor, and they will not have access to ACF's network, they will not be asked to complete the ACF Security and Privacy training.

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

In addition, staff that work with study participants complete Institutional Review Board (IRB) training through the Collaborative Institutional Training Initiative (CITI). The CITI training is valid for three years. All survey data collection team members are trained in the specific study procedures--how to login and access the data for this project, how to safeguard their equipment, how to report any suspected incidents. Staff conducting administrative data collection do so in accordance with the guidance established in the data use agreements that govern that collection of information.

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.

All data collected under this study will be transitioned to ACF or to ACF's designated data archiver by the conclusion of the project, except for data excluded in any data use agreements. In particular, the MOU with OCSE does not allow NDNH data to be taken off the ACF secure server, and the NSC and college records' data sharing agreements do not allow their data to be part of a public use or restricted use file.

All data to be archived will have direct personal identifiers and open-end responses removed, exact dates rolled up to month and year, and other data coarsened to ensure data cells have at least 10 responses (e.g., by rounding dollar values). Once the archiving procedures are finalized, this plan will be updated to describe the process for data transfer, storage, and use by other researchers.

The project vendor will shred paper copies of the prior informed consent forms (collected under the original project) and will provide a certificate of destruction to the IRB and OPRE three years after this contract ends.

All other data that are not specifically excluded in the data use agreements (e.g., the MOU with OCSE does not allow NDNH data to be taken off the ACF secure server) and reporting systems will be transitioned to ACF at the conclusion of the project.

CPE is processing the NARA records retention schedule. ACF will retain CPE data indefinitely until the appropriate records control schedule is approved by NARA.

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

The ability to change or create PII (name and email and contact information for users) is limited based upon least privilege and only granted to privileged users of the system.

Administrative Controls include requiring general security awareness training to be completed by all users plus additional role-based security for privileged users of the system.

Technical Controls include role-based access, positive user identification, passwords, multi-factor authentication, least privilege access, and all the intrusion detection services provided by Amazon Web Services.

Physical Controls are inherited from the hosting cloud and include all the security controls for a commercial data center (security staff personnel checks, visitor access procedures, intrusion detection system, fire suppression, uninterruptible power supply (UPS), climate controls, etc.)