US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:
02/08/2022

OPDIV:
ACF

Name:

National Human Trafficking Training and Technical Assistance Center

PIA Unique Identifier:
P-2486256-792095

The subject of this PIA is which of the following?
Major Application

Identify the Enterprise Performance Lifecycle Phase of the system.
Operations and Maintenance

Is this a FISMA-Reportable system?
Yes

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

Identify the operator.
Agency

Is this a new or existing system?
Existing

Does the system have Security Authorization (SA)?
Yes

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

Correction to System Type selection (Question 3)

Describe in further detail any changes to the system that have occurred since the last PIA.
No changes have occurred.

Describe the purpose of the system.
Consistent with the Administration for Children and Families' (ACF) mission to provide leadership, partnership, and resources for the compassionate and effective delivery of human services, the purpose of the National Human Trafficking Training and Technical Assistance Center (NHTTAC) information system is to deliver training and technical assistance (TTA) to develop, enhance, and sustain quality services for human trafficking survivors.

Describe the type of information the system will collect, maintain (store), or share.
The system will collect, maintain and share information to maintain a consultant network database, maintain a training calendar, process applications for TTA, evaluate scholarships for individuals and

organizations, evaluate on TTA delivered through NHTTAC, and on data collected through needs assessments. Information collected will vary depending on the categories above, but may include first and last name, mailing address, email, phone numbers, certificates (e.g. training completion confirmations), ethnicity, date of birth, gender, employment status, education history, employment history, professional development, language proficiency, user login name and password (user credentials), evaluation responses, and needs assessment responses. Additional information will be nonspecific to an individual and will include training details to support the training calendar and include dates, location, and training topics.

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

The NHTTAC information system is a web-based application associated with the delivery of training and technical assistance (TTA) associated with the provision of quality services for human trafficking survivors. It will facilitate data collection for individuals voluntarily seeking TTA; those individuals will register with the system and provide information necessary to process their request. The system will also collect information from those applying to be TTA providers. All information in NHTTAC will be stored indefinitely as it will be accessed, as needed, to assign consultants, used to track TTA delivered, and to report on evaluation and needs assessment results. For a review of the specific data elements collected, maintained, and shared in NHTTAC, see the response to the above question.

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

Yes

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

Demographics: Gender, Race/Ethnicity

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

How many individuals' PII is in the system?
500-4,999

For what primary purpose is the PII used?
The PII is primarily used to establish and maintain user accounts.

Describe the secondary uses for which the PII will be used.
There are several secondary uses of PII, including the delivery and tracking of TTA, evaluation of TTA, selection of consultants from the consultant network, and awarding scholarships to qualified applicants.

Identify legal authorities governing information use and disclosure specific to the system and program.
22 USC 7104(b); 22 USC 7105(b)(1)(G); 22 USC 7105(c)(4); 22 USC 7105(f) Trafficking Victims Protection Act of 2000; 42 USC 1314b Preventing Sex Trafficking and Strengthening Families Act of 2014;
42 U.S. Code §300d–54. Stop, Observe, Ask, and Respond (SOAR) to Health and Wellness Training Program

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.
In Progress: Outside Experts, 09-90-1601

Identify the sources of PII in the system.

Identify the OMB information collection approval number and expiration date
The OMB information collection approval number and expiration date are: OMB #: 0970-0519, (exp. 03/31/2023).

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.
There is a formal information sharing agreement (ISA) in place for consultants accepted into the NHTTAC network. Through this agreement, consultants' consent to having their contact information (name, email address, and/or phone number) shared with organizations that receive approval for TTA services through NHTTAC.

Describe the procedures for accounting for disclosures.
The system will track all requests by organizations to receive TTA, including the assigned consultant. Details of all disclosures, with the exception of ones that relate to criminal or civil law enforcement, will be provided to the individual named in the record, if requested.

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.
Information will be collected from individuals on web pages and online forms. These collection points will clearly inform the user that their personal information is being collected during the registration and/or application processes. The user can then choose to not enter their information and subsequently not use the system.

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.
To opt-out of the collection of their PII, individuals would need to decide against registering or submitting an application. Registering or submitting an application is voluntary. To opt-out of the use of their PII, individuals can use the contact information on the home page to submit a request to the office and system asking that their information no longer be shared.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.
An email notification will be sent to all registered individuals when major changes to the system concerning disclosure or data uses will occur. No response to the email notification is taken as user consent. Contact information is provided on the home page of the website for users to leverage if they wish to ask a question or register a concern. If a suspected or known breach has occurred, it will be reported to the ACF Incident Response Team to be handled in accordance with HHS/ACF policy.

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.
The NHTTAC will provide support for individuals who indicate concern that PII has been inappropriately obtained, used, or disclosed, or that PII is inaccurate. To support initial reporting of concerns, the information system will include contact information for NHTTAC support staff on the

home page. Once contacted, NHTTAC will establish an issue/ticket associated with the concern, and track progress towards issue resolution within a separate internal help desk system monitored by the NHTTAC support staff. The concerned individual will be contacted via their provided contact information (email or phone) upon initiation of the ticket, as progress is made, and upon resolution of the issue.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

Consultant applicants that have been approved and enrolled in the network will be contacted annually and asked to update their information to ensure data accuracy; their edits will also be reviewed by NHTTAC to ensure continued relevancy. Information integrity and availability will be ensured through information-system monitoring and configuration of event logs to monitor data field changes, provide notifications to the system administrator when certain data events occur, and the ability to generate audit reports at regular intervals. System tests will also ensure that PII is only available to authorized individuals in association with their assigned role.

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.

The determination of which system users are granted access to PII is made based on job responsibility and then the appropriate system role would be assigned to that user's account. The elevated privilege accounts are associated with specific system features and granted to federal staff in the OTIP or their contractor. The administrator account, Admin Only, is limited to administrative activity only and does not allow for other activity within the application. This role is held by direct contractors within the Office of the Chief Information Officer's (OCIOs) operations team. The project team maintains a roles and responsibilities document which outlines each role, its' associated privileges, and the type of user that can hold that role.

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.

Each role within the application is limited in its privileges to control access and integrity of the PII. There are 8 roles that can be assigned based on the various features of NHTTAC and would limit the user to only having increased visibility and control over that feature. For example, there is a role for the Scholarship Manager which grants that user the ability to view and edit applications, change the status of an applicant, upload relevant documentation, and view the application dashboard. This user would not have access to, for example, the consultant network – this would be reserved for a user holding the Consultant Manager role.

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.

NHTTAC information system users and stakeholders (including government system owners, managers, operators, and both direct and non-direct contractors) are required to participate in the ACF annual security awareness training. Additionally, personnel will have access to a user manual describing how to properly enter and manage system data to protect the information being collected and maintained.

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

There is no additional training provided.

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.

NHTTAC records retention schedule is set based on the National Archives and Records Administration (NARA) Transmittal 31, General Records Schedule (GRS) 4.2. However, at this time, we are coordinating with OCIO and NARA to identify the specific GRS Item and Disposition Authority, as well as existing ACF Records Control Schedules (RCS) that may be applicable to the different categories of records within the NHTTAC system. All NHTTAC records will be kept until the RCS direction is available.

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

NHTTAC will be hosted within the FedRAMP Amazon Web Services (AWS) Cloud Platform.
The administrative security controls employed include adhering to ACF, or HHS, policies and procedures around security and privacy; leveraging role-based system access to control the amount of PII available to a user; and annual security training and access to a user manual describing data entry procedures to help maintain the data integrity.
The technical controls are shared between the system and the AWS platform. The system provides controls such as multi-factor authentication for all users to include Personal Identity Verification (PIV) login capability; and AWS provides infrastructure controls such as secure network access points.
The physical controls will all be inherited by the AWS platform and include the following:
Restricting physical access to the data center both at the perimeter and at building ingress points through the help of video surveillance, intrusion detection systems, and 2 rounds of two-factor authentication for each individual accessing a data center floor. Visitors and contractors are required to have ID, sign-in with building security, and be escorted by an authorized staff at all times;
Fire detection and suppression systems;
Uninterruptible Power Supply (UPS);
Climate and Temperature control;
Preventative maintenance

Identify the publicly-available URL:

https://nhttac.acf.hhs.gov

Note: web address is a hyperlink.

Does the website have a posted privacy notice?

Yes

Is the privacy policy available in a machine-readable format?

Yes

Does the website use web measurement and customization technology?

Yes

Select the type of website measurement and customization technologies is in use and if it is used to collect PII.

Other technologies that do not collect PII:

Google Analytics

Does the website have any information or pages directed at children uner the age of thirteen?
No

Does the website contain links to non- federal government websites external to HHS?
Yes

Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?
Yes